



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

CR No. 18-00173 (A) -GW

Plaintiff,

F I R S T  
S U P E R  
I N D I C T M E N T G

v.

JOSE LANDA-RODRIGUEZ,  
aka "Jose Rodriguez-Landa,"  
aka "Jose Landa,"  
aka "Jose Rodriguez,"  
aka "Fox,"  
aka "Fox Tapia,"  
aka "F-X,"  
aka "Alejandro Tapia,"  
aka "Cola Rojo,"  
aka "Red Tail,"  
aka "Pops,"  
aka "Tio,"  
aka "The General,"  
aka "Taras,"  
aka "The Old Man,"  
aka "The Animal,"  
aka "Old School,"  
GABRIEL ZENDEJAS-CHAVEZ,  
aka "Corbatas,"

RAFAEL LEMUS,  
aka "Ere,"  
aka "The Voice,"  
aka "La Voz,"

ALVINO MUÑOZ,  
aka "Bino,"  
aka "B,"

HECTOR DUARTE,  
aka "Lil Man,"  
aka "Hecko,"

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 1959(a)(1), (3), (5): Violent Crimes in Aid of Racketeering Activity; 21 U.S.C. § 846: Conspiracy to Distribute and Possess With Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), (b)(1)(B), (b)(1)(C): Possession with Intent to Distribute Controlled Substances; 18 U.S.C. § 1956(a)(1)(A)(i): Money Laundering; 18 U.S.C. § 1029(a)(3): Possession of at Least Fifteen Access Devices; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 2: Aiding and Abetting and Causing an Act to Be Done; 18 U.S.C. §§ 1963, 982, and 1029, and, 21 U.S.C. § 853: Criminal Forfeiture]

1 SAMANTHA RIVERA,  
2 aka "Sam,"  
3 aka "S,"  
4 MARK LANDEROS,  
5 aka "Smokey,"  
6 aka "Troy,"  
7 aka "Hot,"  
8 CECILIA VIRGEN,  
9 aka "Cecilia DeLeon,"  
10 aka "Sessy,"  
11 aka "Hazel,"  
12 aka "Gia,"  
13 aka "Sky,"  
14 aka "Hooker,"  
15 NANCY DUARTE,  
16 aka "Pink,"  
17 VALENTIN CORDOVA,  
18 aka "Teen,"  
19 DAVID BERNARDINO,  
20 aka "Downer,"  
21 MIRIAM MEZA,  
22 ANA MARTINEZ,  
23 aka "Ana America,"  
24 aka "Bandit,"  
25 ADRIAN ARAIZA,  
26 aka "Chemo,"  
27 DAVID DIAZ,  
28 aka "Stomps,"  
29 ROBERT RAMIREZ,  
30 aka "Wiz,"  
31 JUAN LEONARD GARCIA,  
32 aka "Little John,"  
33 aka "Trevor,"  
34 BRYANNA MCCULLAH,  
35 aka "Bee Bee," and  
36 JUAN NMN GARCIA,  
37 aka "Trouble,"

38 Defendants.

39  
40 The Grand Jury charges:

41  
42 GENERAL ALLEGATIONS

43 A. HISTORY AND STRUCTURE OF THE MEXICAN MAFIA

44 1. The Mexican Mafia, also known as "La Eme," is a "gang of  
45 gangs" comprised mostly of senior members of southern California  
46 Hispanic street gangs who have come together to control and profit  
47 from the activities of Hispanic gangs operating in southern

1 California. La Eme was established in the 1950s by Hispanic youth  
2 inmates at the Duell Vocational Facility, but over the decades has  
3 morphed into an international criminal organization. Today, there  
4 are approximately 140 full members of the Mexican Mafia, referred to  
5 as "carnales" or "brothers." The majority of Mexican Mafia members  
6 are incarcerated in California prisons or jails or in federal  
7 prisons. By exercising control over inmates in the prison and jail  
8 systems, primarily through violence and threats of violence, the  
9 Mexican Mafia is able to control the activities of southern  
10 California Hispanic criminal street gangs, both inside and outside  
11 custody facilities. Mexican Mafia members and associates wield such  
12 power over the prison and jail populations that they are able to  
13 order that acts of violence be carried out not only against other  
14 prison or jail inmates, but also against street gang members and  
15 others outside of prison or jail.

16       2. Members of the Mexican Mafia have divided control of, and  
17 the rights to criminal proceeds from, nearly all penal facilities in  
18 California, including state prison and county jail systems.  
19 Similarly, members of the Mexican Mafia have divided the rights to  
20 criminal proceeds from the activities of southern California Hispanic  
21 criminal street gangs in various southern California neighborhoods.

22       3. Generally, one member of the Mexican Mafia has control of  
23 and rights to a specific facility. That member, whether incarcerated  
24 in that facility or not, will control the smuggling of drugs into the  
25 facility, the collection of taxes from the sale of those drugs,  
26 extortion within that facility (including the kitty and other fines  
27 discussed below), and the maintenance of discipline within the  
28

1 facility. In some cases, different members of the Mexican Mafia may  
2 control different parts of the same facility.

3       4. Similarly, members of the Mexican Mafia have divided  
4 control of and the rights to "taxes," or a share of criminal proceeds  
5 from criminal activities including drug trafficking, from nearly all  
6 Hispanic gangs in southern California. Generally, one member of the  
7 Mexican Mafia has control of and rights to a specific area; that  
8 Mexican Mafia member will control the sale of drugs within that area,  
9 the collection of taxes from that area, and the maintenance of  
10 discipline over gang members from that area.

11       5. The division of control of custody facilities and  
12 neighborhoods is generally agreed upon by the members of the Mexican  
13 Mafia, although there are occasionally disputes among members as to  
14 the division. Once a Mexican Mafia member acquires control of a  
15 custody facility or neighborhood, he can generally operate that  
16 custody facility or neighborhood without interference from other  
17 members. The Mexican Mafia member in control of a custody facility  
18 or neighborhood will put together a team of trusted associates to  
19 control the custody facility or neighborhood.

20       6. The Mexican Mafia is split into two major subgroups,  
21 "State" and "Federal." A State Mexican Mafia member can control  
22 state prisons, southern California jails, and southern California  
23 neighborhoods, but generally not federal facilities. A Federal  
24 Mexican Mafia member can control federal facilities anywhere in the  
25 country, and southern California neighborhoods, but usually cannot  
26 control a state prison or a county jail.

27       7. To become a Mexican Mafia member, a Hispanic gang member  
28 generally must have a distinguished reputation for "putting in work"

1 on behalf of the Mexican Mafia, meaning the gang member has murdered  
2 or assaulted enemies and rivals of Mexican Mafia members.

3 Prospective members are also expected to have provided financial  
4 assistance to Mexican Mafia members, and to have followed the Mexican  
5 Mafia rules that govern the streets or correctional institutions.

6 8. Mexican Mafia members carry out their criminal activity  
7 with the help of associates. Some of these trusted associates act as  
8 "shot-callers," that is, high-level associates who have been given  
9 the authority to conduct affairs of the Mexican Mafia, such as  
10 collecting extortion and drug money and enforcing discipline in their  
11 particular areas of control. A "facilitator" is the highest level  
12 shot-caller and works directly under the authority of the Mexican  
13 Mafia member who appointed him. The facilitator coordinates the  
14 activities of the other shot-callers and is responsible for ensuring  
15 that other shot-callers carry out the Mexican Mafia member's orders  
16 in their area of responsibility, whether in a neighborhood or a  
17 custody facility.

18 9. Members of Hispanic street gangs in southern California are  
19 referred to as "Sureños" and fall under the control of the Mexican  
20 Mafia. "Sureños" may also be referred to as "Southsiders."  
21 Additionally, the Mexican Mafia considers Mexican nationals, referred  
22 to as "Paisas," and Hispanic-American citizens who are not members of  
23 a gang, generally referred to as "Residents," to fall under the  
24 Mexican Mafia's control while in a custody facility, and trusted  
25 Residents and Paisas may participate in or be given shot-caller  
26 positions in Mexican Mafia affairs.

27 10. Members and associates of street gangs controlled by and/or  
28 affiliated with the Mexican Mafia must pay "taxes" to members and

1 associates of the Mexican Mafia for permission to maintain control  
2 over their territories in order to distribute drugs and engage in  
3 other criminal activity. This system of "taxation" amounts to  
4 widespread extortion. These "taxes" also ensure the protection of  
5 the gang's members once they enter prisons or jails. The "taxing"  
6 and control applies to activities both in and out of jail or prison.  
7 Indeed, a jail or prison, or a floor, yard, or other unit of a jail  
8 or prison is considered by the Mexican Mafia to be territory just as  
9 much as a neighborhood.

10       11. Surenos, whether in a custody facility or in a  
11 neighborhood, operate as soldiers or workers for the Mexican Mafia.  
12 Indeed, being loyal to the Mexican Mafia is an integral part of being  
13 a southern California Hispanic street gang member, and it is openly  
14 understood that when individuals join such gangs that they are  
15 joining an entity loyal to the Mexican Mafia. Members of such gangs  
16 are expected to, and are proud to, carry out the orders of the  
17 Mexican Mafia member in control of their neighborhood or custody  
18 facility, because doing work for the Mexican Mafia increases the gang  
19 member's status and reputation. Some gangs proudly include in their  
20 name the number "13," denoting the letter M, or "eme" in Spanish, in  
21 order to demonstrate the gang's loyalty and allegiance to the Mexican  
22 Mafia.

23       B. THE MEXICAN MAFIA'S ORGANIZATION WITHIN THE LOS ANGELES COUNTY  
24                   JAIL SYSTEM

25       12. The Los Angeles County Jail System ("LACJ" or "the System")  
26 is operated by the Los Angeles County Sheriff's Department ("LASD")  
27 and receives moneys from the United States Department of Homeland  
28 Security and other federal agencies. The system includes various

1 men's facilities including Men's Central Jail ("MCJ"), the Twin  
2 Towers Correctional Facility ("Twin Towers"), the Inmate Reception  
3 Center ("IRC"), the North County Correctional Facility ("NCCF"),  
4 Pitchess Detention Center—North Facility ("Pitchess North"), Pitchess  
5 Detention Center—East Facility ("Pitchess East"), and Pitchess  
6 Detention Center—South Facility ("Pitchess South"). On any given  
7 day, the System houses approximately 15,000 inmates.

8 13. At any time, one Mexican Mafia member may exercise control  
9 over the entire LACJ system, or control of various facilities within  
10 the System may be divided among different members of the Mexican  
11 Mafia. The Mexican Mafia member in charge of an LACJ custody  
12 facility maintains control over the facility with the assistance of  
13 trusted shot-callers, facilitators, and associates. These Mexican  
14 Mafia members and associates, working together to control criminal  
15 activity within LACJ, have become their own entity or enterprise and  
16 effectively function as an illegal government within LACJ custody  
17 facilities ("the Mexican Mafia LACJ Enterprise").

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28

1 COUNT ONE

2 [18 U.S.C. § 1962(d) ]

3 [DEFENDANTS JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL  
4 LEMUS, ALVINO MUÑOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS,  
5 CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO,  
6 MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, AND DAVID DIAZ]

7 1. Paragraphs 1 through 13 of the General Allegations of this  
8 First Superseding Indictment are re-alleged and incorporated by  
9 reference as if fully set forth herein.

10 A. THE RACKETEERING ENTERPRISE

11 2. At all times relevant to this First Superseding Indictment,  
12 defendants JOSE LANDA-RODRIGUEZ, also known as ("aka") "Jose  
13 Rodriguez-Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox,"  
14 aka "Fox Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo,"  
15 aka "Red Tail," aka "Pops," aka "Tio," aka "The General," aka  
16 "Taras," aka "The Old Man," aka "The Animal," aka "Old School,"  
17 GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," RAFAEL LEMUS, aka "Ere," aka  
18 "The Voice," aka "La Voz," ALVINO MUÑOZ, aka "Bino," aka "B," HECTOR  
19 DUARTE, aka "Lil Man," aka "Hecko," SAMANTHA RIVERA, aka "Sam," aka  
20 "S," MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot," CECILIA  
21 VIRGEN, aka "Cecilia DeLeon," aka "Sessy," aka "Hazel," aka "Gia,"  
22 aka "Sky," aka "Hooker," NANCY DUARTE, aka "Pink," VALENTIN CORDOVA,  
23 aka "Teen," DAVID BERNARDINO, aka "Downer," MIRIAM MEZA, ANA  
24 MARTINEZ, aka "Ana America," aka "Bandit," ADRIAN ARAIZA, aka  
25 "Chemo," and DAVID DIAZ, aka "Stomps," and others known and unknown  
26 to the Grand Jury, were members and associates of an organization  
27 engaged in, among other things, acts involving murder, kidnapping,  
28 robbery, extortion, trafficking in controlled substances, witness

1 tampering, money laundering, and identity theft. At all relevant  
2 times, this organization, hereinafter the "Mexican Mafia LACJ  
3 Enterprise," operated within the Central District of California and  
4 elsewhere. The Mexican Mafia LACJ Enterprise, including its leaders,  
5 members, and associates, constitutes an "enterprise," as defined by  
6 Title 18, United States Code, Section 1961(4), that is, a group of  
7 individuals associated in fact, although not a legal entity, which is  
8 engaged in, and the activities of which affect, interstate and  
9 foreign commerce. The Mexican Mafia LACJ Enterprise constitutes an  
10 ongoing organization whose members function as a continuing unit for  
11 a common purpose of achieving the objectives of the enterprise.

12 3. The Mexican Mafia LACJ Enterprise operates for the benefit  
13 of the Mexican Mafia member or members deemed by the Mexican Mafia to  
14 be in control of LACJ. The Mexican Mafia LACJ Enterprise conducts  
15 its activities within LACJ facilities and in some surrounding  
16 neighborhoods by imposing the rules of the Mexican Mafia on inmates  
17 within LACJ facilities and on members of predominantly Hispanic  
18 street gangs. Using the methods of the Mexican Mafia, the Mexican  
19 Mafia LACJ Enterprise carries out its goals of controlling drug  
20 trafficking activities and the distribution of drug trafficking  
21 proceeds, extortion, and the enforcement of Mexican Mafia rules both  
22 inside and outside LACJ facilities.

23 4. The Mexican Mafia LACJ Enterprise operates to carry out the  
24 goals and objectives of the Mexican Mafia within LACJ custody  
25 facilities and in some surrounding neighborhoods, including by  
26 directing and controlling drug trafficking activities and the  
27 distribution of drug trafficking proceeds, extortion, as well as the  
28 enforcement of Mexican Mafia rules (which are used as a basis for

1 extortion), both inside and outside the LACJ custody facilities.

2 More specifically:

3 a. The Mexican Mafia LACJ Enterprise keeps track of  
4 southern California Hispanic gang members through lists known as  
5 "roll calls," made to keep track of every Sureno in a particular  
6 module or dorm, often including the inmate's name, booking number,  
7 next court date, gang, and/or moniker. This enables the Mexican  
8 Mafia LACJ Enterprise to track down persons in bad standing, to  
9 coordinate the movement of drugs and kites, to account for kitty  
10 revenue, and other enterprise business.

11 b. Mexican Mafia LACJ Enterprise members and associates  
12 in prisons or jails send instructions to local street gangs and other  
13 Mexican Mafia members and associates, both inside and outside prison  
14 and jail, via telephone calls, prison system e-mails, letters,  
15 "kites" (which are notes smuggled by prisoners), "verbals" (passing a  
16 particularly sensitive message verbally from inmate to inmate), and  
17 by conveying messages through jail or prison visitors. Mexican Mafia  
18 LACJ Enterprise members and associates generally use coded language  
19 in order to conceal the true nature of their discussions with and  
20 instructions to criminal associates. In order to pass on  
21 instructions and information from prison and jail, Mexican Mafia LACJ  
22 Enterprise members and associates generally rely on associates, often  
23 female, known as "secretaries," who communicate with incarcerated  
24 Mexican Mafia members and associates and relay their instructions to  
25 others. In addition, attorneys who are willing to assist in the  
26 Mexican Mafia's criminal activities are utilized by the Mexican Mafia  
27 LACJ Enterprise to pass messages concerning these activities and to  
28 facilitate communication among its members and associates. These

1 attorneys are particularly valued by members of the Mexican Mafia  
2 LACJ Enterprise because they provide a means to shield criminal  
3 communications from law enforcement by providing the appearance of  
4 attorney-client privilege and a veneer of legitimacy to their  
5 criminal communications. Both secretaries and attorneys are treated  
6 as respected criminal figures by members of street gangs controlled  
7 by and/or affiliated with the Mexican Mafia LACJ Enterprise.

8                   c. Another method of communication employed by the  
9 Mexican Mafia LACJ Enterprise is telephone calls made with "burnout"  
10 phones. Burnout phones are phones that use landline service opened  
11 with stolen identities. The Mexican Mafia LACJ Enterprise uses  
12 burnout phones to make collect calls from prisons and jails to  
13 associates on the outside until the telephone company realizes the  
14 account is fraudulent and shuts the line off.

15                   d. The Mexican Mafia LACJ Enterprise commonly extorts  
16 money from gang members and associates who violate enterprise rules  
17 and from those who want to engage in profitable activities in areas  
18 controlled by the Mexican Mafia LACJ Enterprise. If the gang member  
19 or associate does not pay the demanded sum, or has violated Mexican  
20 Mafia or enterprise rules, a Mexican Mafia leader commonly will order  
21 that the person be assaulted until that individual complies.  
22 Alternatively, if the non-compliant individual refuses to pay, or if  
23 the enterprise is not able to punish the individual, the Mexican  
24 Mafia LACJ Enterprise may extort or punish family members, close  
25 associates, members of that person's gang, or others related to the  
26 person. If a person or gang does not meet the Mexican Mafia LACJ  
27 Enterprise's payment demands, they will be subjected to violence  
28 until they comply.

1                   e. One of the Mexican Mafia LACJ Enterprise's most  
2 effective ways of extorting or taxing gang members and other Hispanic  
3 inmates in jail or prison is through the "kitty." Once a week, in  
4 every module of the Los Angeles County Jail system, inmates are  
5 allowed to purchase items from the LASD-operated store or commissary.  
6 These items include candy bars, soup, ramen noodles, shower shoes,  
7 deodorant, baby powder, and other food and personal hygiene items.  
8 In every jail module controlled by the Mexican Mafia LACJ Enterprise,  
9 every Hispanic gang member, Paisa, or Resident is required to  
10 contribute commissary items of a certain value (e.g., one dollar's  
11 worth of items) into the kitty for every set amount of items  
12 purchased (e.g., fifteen dollars' worth). The Mexican Mafia member  
13 in control of the module sets the contribution rates for the kitty,  
14 and the module shot-caller collects the commissary items and sells  
15 them to a person in the module for a price that is also set by the  
16 Mexican Mafia member. The payment for the kitty is made to a  
17 secretary or facilitator outside of the facility, who forwards it to  
18 the Mexican Mafia member who controls that facility.

19                   f. The Mexican Mafia LACJ Enterprise also makes money by  
20 controlling the sales of drugs. On the streets, profiting from drug  
21 trafficking takes the form of "taxing" drug dealers. All drug  
22 dealers in an area controlled by the Mexican Mafia LACJ Enterprise  
23 must pay a percentage of their profits from the sale of drugs to the  
24 enterprise. If the drug dealer does not pay, he will not be allowed  
25 to sell drugs in that area, under threat of assault or even death.  
26 If the drug dealer does pay the tax, the drug dealer benefits by  
27 receiving protection from other dealers or robbers and gains  
28 assistance in collecting debts.

1                   g. Inside of custody facilities, the taxing of drug  
2 trafficking takes two forms. First, Mexican Mafia members, shot-  
3 callers, and associates will arrange for drugs to be smuggled to them  
4 inside the Los Angeles County Jail System. Once the Mexican Mafia  
5 member or his trusted shot-caller or facilitator within a facility  
6 receives the drugs, he will direct their sale within the Los Angeles  
7 County Jail system with the proceeds benefiting the member in control  
8 of that facility. Furthermore, others within the facility will not  
9 be allowed to sell their own drugs until the Mexican Mafia member's  
10 drugs have been sold. Second, the Mexican Mafia's control of drug  
11 trafficking is maintained by collecting a "thirds" tax on all other  
12 drugs that are smuggled into the Los Angeles County Jail system.  
13 Pursuant to the thirds tax, one third of each shipment of drugs that  
14 is smuggled into the Los Angeles County Jail system must be "broken-  
15 off" and given to the Mexican Mafia member in control of the facility  
16 or his trusted shot-caller or facilitator. If the Mexican Mafia  
17 member decides to sell the "thirds-tax" portion of the drugs, they  
18 are sent to a dorm or module for sale with the proceeds going to the  
19 Mexican Mafia member, and others in the facility are not allowed to  
20 sell drugs until the Mexican Mafia member's thirds have been sold.

21                   h. The Mexican Mafia LACJ Enterprise does not limit its  
22 extortion to the sale of drugs and the operation of the kitty. The  
23 enterprise may subject any person or inmate in a Mexican Mafia LACJ  
24 Enterprise controlled neighborhood, facility, or module to extortion  
25 for any money-generating activity he or she engages in while in the  
26 enterprise controlled territory.

27                   i. The Mexican Mafia LACJ Enterprise has self-imposed  
28 rules handed down by the Mexican Mafia. These rules, referred to as

1 "reglas," are imposed to maintain fear and compliance among Surenos.  
2 Because these rules provide a basis for being fined as well as  
3 assaulted, they are a key part of the Mexican Mafia LACJ Enterprise's  
4 extortion scheme. If a southern California Hispanic gang member  
5 should break one of these rules, discipline is imposed by a  
6 facilitator, shot-caller, or secretary of the Mexican Mafia member in  
7 control of the facility. Such discipline is frequently imposed in  
8 the form of a fine or an assault. Assaults are often referred to as  
9 "13 Seconds," "26 Seconds," or "39 Seconds." The premise underlying  
10 these punishments is that a person who breaks an enterprise rule  
11 should be punished by beatings for either 13 seconds, or for a  
12 multiple of 13 seconds. Thirteen seconds is a less severe form of  
13 punishment that usually involves two individuals assaulting the  
14 offender for thirteen seconds. Thirty-nine seconds is a more severe  
15 form of punishment that involves three (or in some cases more)  
16 individuals assaulting the offender for 39. Thirty-nine seconds can  
17 have different variations. For example, thirty-nine seconds could be  
18 issued in the form of three 13-second assaults on the same day  
19 (sometimes referred to as "breakfast, lunch, and dinner") or it could  
20 be one 39-second assault. A 39-second punishment where three  
21 individuals assault an offender for 39 consecutive seconds is also  
22 commonly referred to as a "smash out" because the offender is usually  
23 moved out of the area after the assault for his own safety by prison  
24 or jail personnel. Finally, "sopas," the Spanish word for "soups,"  
25 is another common term for an assault.

k. Another important rule of the Mexican Mafia that is enforced within the Mexican Mafia LACJ Enterprise is that any inmate who is in custody for a sex offense is to be assaulted on sight. After the sex offender is assaulted, the Mexican Mafia then extorts payment from the sex offender in exchange for the Mexican Mafia's agreement that there will be no further assaults.

1. The most serious form of discipline is being put on the "green light list" or being "greenlighted." Being placed on the green light list means that every Sureño is obligated to severely assault the person, even if death is likely to result. Only true/full members of the Mexican Mafia can put a person, group, or entire gang on the green light list. Those who are put on a green light list can be removed by the payment of a hefty fine.

## B. PURPOSES OF THE ENTERPRISE

5. The purposes of the Mexican Mafia LACJ Enterprise include, but are not limited to, the following:

a. Enriching members and associates of the Mexican Mafia LACJ Enterprise through, among other things, the control of and participation in the distribution of controlled substances both within LACJ and in Mexican Mafia-controlled territories outside of LACJ, extortion of others engaged in the distribution of controlled substances and other crimes within and outside of LACJ, and extortion of inmates within LACJ.

b. Maintaining control and authority over LACJ, often through threats, intimidation, and acts of violence against LACJ inmates.

11

1                   c.     Maintaining control and authority over LACJ in order  
2 to maintain general Mexican Mafia discipline and to ensure that the  
3 rules and orders are obeyed.

4                   d.     Promoting and enhancing the Mexican Mafia LACJ  
5 Enterprise's members and associates and their activities.

6                   e.     Punishing Mexican Mafia members and associates who do  
7 not comply with the rules and orders of the Mexican Mafia in general,  
8 including and especially those who cooperate with law enforcement.

9                   C.     MEANS AND METHODS OF THE ENTERPRISE

10                  6.     The means and methods by which the defendants and their  
11 associates conduct and participate in the conduct of the affairs of  
12 the Mexican Mafia LACJ Enterprise include the following:

13                  a.     Engaging in drug trafficking, including the smuggling  
14 of controlled substances into LACJ, as a means to generate income.

15                  b.     Engaging in extortion, including the operation of the  
16 kitty within LACJ, and including fines for violations of Mexican  
17 Mafia rules, as a means to generate income.

18                  c.     Working together to collect a portion of the proceeds  
19 of drug trafficking conducted by others both outside of LACJ and  
20 inside of LACJ, such as through the thirds tax, as a means to  
21 generate income.

22                  d.     Committing, attempting to commit, and threatening to  
23 commit acts of violence to protect and expand the enterprise's  
24 criminal operation, including assaults, murders, acts of  
25 intimidation, and threats of violence directed against rival gang  
26 members, witnesses to the Mexican Mafia LACJ Enterprise's criminal  
27 conduct, and Mexican Mafia members and associates who do not follow  
28 the rules and orders of the Mexican Mafia in general.

1                   e. Promoting a climate of fear, particularly among rival  
2 gang members, potential witnesses to the enterprise's criminal  
3 conduct, Hispanic gang members, Paisas, or others who may cooperate  
4 with law enforcement within LACJ and throughout southern California,  
5 through acts of violence and threats to commit acts of violence.

6                   f. Engaging in the aforementioned criminal activity in  
7 the presence of other Mexican Mafia LACJ Enterprise members or  
8 associates in order to enhance the status of those affirmatively  
9 conducting the criminal acts, and committing the aforementioned  
10 criminal activity for the purpose of earning the respect of Mexican  
11 Mafia LACJ Enterprise members in the hope of achieving higher status.

12                  g. In the case of more senior members of the Mexican  
13 Mafia LACJ Enterprise and their designated assistants, including  
14 secretaries, shot-callers, and facilitators, providing instructions  
15 to junior members and associates regarding distribution of controlled  
16 substances, including smuggling controlled substances into LACJ,  
17 collection of drug and extortion proceeds, commission of acts of  
18 violence, commission of fraud and identity theft, and providing  
19 verification that such crimes have occurred.

20                  h. In the case of more junior members and associates of  
21 the Mexican Mafia LACJ Enterprise, engaging in the smuggling of  
22 controlled substances into LACJ, carrying out assaults in LACJ and  
23 elsewhere, and committing fraud and identity theft, all on the orders  
24 of more senior members and associates.

25                  D. OBJECT OF THE CONSPIRACY

26                  7. Beginning on a date unknown, and continuing until at least  
27 March 29, 2018, in Los Angeles and San Bernardino Counties, within  
28 the Central District of California, and elsewhere, defendants JOSE

1 LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUNOZ,  
2 HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY  
3 DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA  
4 MARTINEZ, ADRIAN ARAIZA, and DAVID DIAZ, and others known and unknown  
5 to the Grand Jury, being persons employed by and associated with the  
6 Mexican Mafia LACJ Enterprise, an enterprise which was engaged in,  
7 and the activities of which affected, interstate and foreign  
8 commerce, knowingly and intentionally conspired to violate Title 18,  
9 United States Code, Section 1962(c), that is, to conduct and  
10 participate, directly and indirectly, in the conduct of the affairs  
11 of that enterprise through a pattern of racketeering activity, as  
12 that term is defined in Title 18, United States Code, Sections  
13 1961(1) and 1961(5), consisting of:

14 multiple acts involving:

15 a. Murder, in violation of California Penal Code Sections  
16 21a, 31, 182, 187, 189, and 664;

17 b. Kidnapping, in violation of California Penal Code  
18 Sections 21a, 31, 182, 207, 209, and 664;

19 c. Robbery, in violation of California Penal Code  
20 Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

21 d. Extortion, in violation of California Penal Code  
22 Sections 21a, 31, 182, 518, 519, 524, and 664;

23 multiple offenses involving:

24 e. the distribution of, possession with intent to  
25 distribute, and conspiracy to possess with intent to distribute and  
26 distribute controlled substances, including methamphetamine, heroin,  
27 cocaine, cocaine base, and marijuana, in violation of Title 21,  
28 United States Code, Sections 841(a)(1) and 846;

1 and multiple acts indictable under the following provisions of  
2 federal law:

3 f. Title 18, United States Code, Section 1512, Tampering  
4 with a Witness;

5 g. Title 18, United States Code, Section 1513,  
6 Retaliating against a witness;

7 h. Title 18, United States Code, Sections 1956 and 1957,  
8 Money Laundering;

9 i. Title 18, United States Code, Section 1028, Identity  
10 Fraud; and

11 j. Title 18, United States Code, Section 1029, Access  
12 Device Fraud.

13 8. It was a further part of the conspiracy that each defendant  
14 agreed that a conspirator would commit at least two acts of  
15 racketeering in the conduct of the affairs of the enterprise.

16 E. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
17 ACCOMPLISHED

18 9. The object of the conspiracy was to be accomplished, in  
19 substance, as follows:

20 a. Defendant JOSE LANDA-RODRIGUEZ and deceased Mexican  
21 Mafia member 1 ("DMM-1") and deceased Mexican Mafia member 2 ("DMM-  
22 2"), as full members of the Mexican Mafia, would have the right to  
23 control and collect criminal proceeds, including proceeds from  
24 extortion and the sale of controlled substances, from neighborhoods  
25 or correctional facilities.

26 i. DMM-1 would control the Los Angeles County Jail  
27 System from around October 2007 until his death on June 20, 2013.

ii. Defendant JOSE LANDA-RODRIGUEZ would control the Los Angeles County Jail System from on or about June 20, 2013, until at least January 26, 2016, except that he would cede control of NCCF to DMM-2, on or about July 6, 2014.

iii. DMM-2 would control NCCF from July 6, 2014, through his death in June 2016.

b. Defendants GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, and ALVINO MUNOZ, and co-conspirators Luis Garia, Daniel Cervantes, Miguel Calderon, Ernesto Vargas, Miguel Rodriguez, Gilbert Parra, Gerardo Tapia, and Donato Gonzales, and unindicted co-conspirator 1 ("UICC-1"), would act as facilitators for one or more full members of the Mexican Mafia who was also a member of the Mexican Mafia LACJ Enterprise and would act with the authority of that Mexican Mafia LACJ Enterprise member in directing the criminal activities of the Mexican Mafia LACJ Enterprise, including extortion and the sale of controlled substances.

i. UICC-1 would carry out the orders of DMM-1 within the Los Angeles County Jail System from about July 2012 through on or about June 20, 2013.

ii. UICC-1 would carry out the orders of defendant JOSE LANDA-RODRIGUEZ within the Los Angeles County Jail System from on or about June 20, 2013, through on or about November 5, 2013.

iii. Defendant GABRIEL ZENDEJAS-CHAVEZ, from outside the Los Angeles County Jail System, would use his position as an attorney to assist defendant JOSE LANDA-RODRIGUEZ, and co-conspirators Luis Garcia and DMM-2, and other co-conspirators, with activities inside and outside the Los Angeles County Jail System.

iv. Defendant RAFAEL LEMUS, from outside the Los Angeles County Jail system, would work for and carry out the orders for DMM-2, including collecting drug proceeds, fines, and kitty extortion from NCCF from on or before February 4, 2014, through November 22, 2015.

v. Co-conspirator Luis Garcia, from inside the Los Angeles County Jail System, would work for and carry out the orders of defendant JOSE LANDA-RODRIGUEZ from on or about November 5, 2013, through on or about May 28, 2014.

vi. Defendant ALVINO MUNOZ, from both inside and outside the Los Angeles County Jail System, would work for and carry out the orders of defendant JOSE LANDA-RODRIGUEZ from about April 2015 through at least July 2015.

vi. Co-conspirator Daniel Cervantes, from outside the Los Angeles County Jail System, would work for and carry out the orders of DMM-1 from on or about October 22, 2012, through on or about May 10, 2013.

viii. Co-conspirator Miguel Calderon, from outside the Los Angeles County Jail System, would work to direct activities within NCCF, MCJ, and Twin Towers on behalf of defendant JOSE LANDA-RODRIGUEZ from on or about June 20, 2013, through on or about June 30, 2013.

ix. Co-conspirator Ernesto Vargas, from outside the Los Angeles County Jail System, would work to direct activities within NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ from on or about October 1, 2013, through on or about July 6, 2014.

x. Co-conspirator Miguel Rodriguez, from outside the Los Angeles County Jail System, would work to direct activities

1 within NCCF on behalf of DMM-2, from on or about July 6, 2014, until  
2 on or about October 23, 2014.

3                   xi. Co-conspirator Gilbert Parra, from both inside  
4 and outside the Los Angeles County Jail System, would direct the  
5 activities within NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ  
6 from on or about October 10, 2013, to on or about December 26, 2013.

7                   xii. Co-conspirator Gerardo Tapia, from outside the  
8 Los Angeles County Jail System, would direct drug trafficking  
9 activities outside the Los Angeles County Jail System on behalf of  
10 DMM-2 from on or about April 18, 2014, through on or about May 9,  
11 2014.

12                   xiii. Co-conspirator Donato Gonzalez, from both  
13 inside and outside the Los Angeles County Jail System, would direct  
14 activities within and outside the Los Angeles County Jail System on  
15 behalf of DMM-2 from on or about April 18, 2014, through on or about  
16 May 9, 2014.

17                   c. Defendants HECTOR DUARTE, SAMANTHA RIVERA, and MARK  
18 LANDEROS, and co-conspirators Miguel Garcia and Jonathan Verdeja, and  
19 unindicted co-conspirator 2 ("UICC-2"), unindicted co-conspirator 3  
20 ("UICC-3") unindicted co-conspirator 4 ("UICC-4"), and unindicted co-  
21 conspirator 5 ("UICC-5"), would act as facilitators for one or more  
22 full members of the Mexican Mafia, and would carry out specific  
23 orders related to the criminal activities of the Mexican Mafia LACJ  
24 Enterprise, including extortion and the sale of controlled  
25 substances, in specific locations, including LACJ.

26                   i. UICC-3, from inside the Los Angeles County Jail  
27 System, would direct activities at MCJ and Twin Towers on behalf of  
28

1 DMM-1 from on or about December 18, 2012, through on or about June  
2 20, 2013.

15 v. Defendant SAMANTHA RIVERA, from outside the Los  
16 Angeles County Jail System, would coordinate defendant JOSE LANDA-  
17 RODRIGUEZ'S dealings with other Mexican Mafia members from on or  
18 about June 20, 2013, through on or about December 18, 2015.

19 vi. Defendant MARK LANDEROS, from inside the Los  
20 Angeles County Jail System, would direct activities at MCJ and Twin  
21 Towers on behalf of defendant JOSE LANDA-RODRIGUEZ, from on or about  
22 July 24, 2013, through on or about June 5, 2014.

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28 //

viii. UICC-2, from inside the Los Angeles County Jail System, would direct activities at MCJ and Twin Towers on behalf of defendant JOSE LANDA-RODRIGUEZ.

ix. UICC-4, from inside the Los Angeles County Jail System, would direct activities at NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ from on or about June 20, 2013, through on or about June 30, 2013.

x. UICC-5, from outside LACJ, would direct activities at NCCF on behalf of DMM-2, from on or about August 22, 2015, through June 4, 2016.

d. Defendants CECILIA VIRGEN and NANCY DUARTE, UICC-6, and co-conspirators Laureen Garcia, Valerie Trejo, Genessis Blanco, and Kelly Jo Bell, would act as secretaries for high-level Mexican Mafia LACJ Enterprise associates, passing messages regarding, facilitating communication about, and keeping records of the criminal activities of the Mexican Mafia LACJ Enterprise, including extortion and the sale of controlled substances.

i. Defendant CECILIA VIRGEN would act as the secretary for co-conspirator Daniel Cervantes for activities inside the Los Angeles County Jail System from on or about December 18, 2012, through on or about May 22, 2013.

ii. Co-conspirator Laureen Garcia would act as the secretary for co-conspirator Ernesto Vargas for activities inside NCCF from on or about October 1, 2013, through on or about November 1, 2013.

iii. Defendant NANCY DUARTE would act as the secretary for defendant HECTOR DUARTE for activities at NCCF from on or about July 6, 2014, through on or about October 23, 2014.

iv. Co-conspirator Valerie Trejo would act as the secretary for UICC-3 for activities at MCJ and Twin Towers from on or about February 2013, through on or about June 20, 2013.

v. Co-conspirator Kelly Jo Bell would act as a secretary for defendant ALVINO MUNOZ from August 19, 2015, through October 14, 2015.

vi. Co-conspirator Genesis Blanco would act as a secretary for DMM-2 and UICC-6 for activities inside NCCF from on or about August 22, 2015, through on or about October 23, 2015.

vi. UICC-6 would act as a secretary for defendant  
MARK LANDEROS in January 2016.

e. Unindicted co-conspirator 7 ("UICC-7") would carry out the orders of DMM-1, UICC-1, and UICC-3 to control Twin Towers from on or about July 17, 2012, through on or about June 20, 2013.

f. Defendants VALENTIN CORDOVA and DAVID BERNARDINO, and co-conspirators Miguel Garcia, Jose Flores, Mark Levy, Frankie Megorado, Manuel Jimenez, Alavaro Leyva, Chris Ferreira, and Andrew Pineda, and unindicted co-conspirators Robert Ramirez, UICC-4, unindicted co-conspirator 8 ("UICC-8"), unindicted co-conspirator 10 ("UICC-10"), unindicted co-conspirator 11 ("UICC-11"), and unindicted co-conspirator 12 ("UICC-12"), would carry out the orders of the Mexican Mafia LACJ Enterprise within specific portions of the Los Angeles County Jail System, thereby facilitating the criminal activities of the Mexican Mafia LACJ Enterprise, including extortion and the sale of controlled substances.

i. Co-conspirator Jose Flores would carry out the orders of defendant CECILIA VIRGEN in NCCF from on or about December 19, 2012, through on or about January 22, 2013.

ii. UICC-8 would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about October 26, 2012, through on or about December 28, 2012.

iii. Co-conspirator Mark Levy would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about February 10, 2013, through on or about February 13, 2013.

iv. Defendant VALENTIN CORDOVA would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about April 2, 2013, through on or about May 20, 2013.

v. UICC-11 would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about March 25, 2013, through on or about May 23, 2013.

vi. Co-conspirator Frankie Megorado would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about April 6, 2013, through on or about May 22, 2013, and would carry out the orders of co-conspirator Laureen Garcia inside NCCF from on or about May 23, 2013, through October 5, 2013.

vi. Co-conspirator Jose Olea would carry out the orders of defendant CECILIA VIRGEN inside NCCF from on or about April 7, 2013, through on or about April 13, 2013.

viii. UICC-10 would carry out the orders of UICC-3 inside MCJ and Twin Towers from on or about December 30, 2012, through on or about May 30, 2013.

ix. UICC-4 would carry out the orders of co-conspirator Miguel Calderon inside NCCF from on or about June 20, 2013, through on or about June 30, 2013.

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x. Co-conspirator Manuel Jimenez would carry out the orders of co-conspirator Laureen Garcia inside NCCF from on or about October 1, 2013, through on or about November 1, 2013.

xi. Co-conspirator Alavarro Leyva would carry out the orders of co-conspirator Laureen Garcia inside NCCF from on or about October 2, 2013, through on or about October 5, 2013.

xii. Co-conspirator Chris Ferreira would carry out the orders of defendant NANCY DUARTE inside NCCF from on or about July 6, 2014, through on or about July 25, 2014.

xiii. Co-conspirator Miguel Garcia would carry out the orders of co-conspirator Ernesto Vargas inside NCCF from on or about September 24, 2013, through on or about October 21, 2013, and would carry out the orders of unindicted co-conspirator 52 ("UICC-52") inside NCCF from in and around November 2016.

xiv. Defendant DAVID BERNARDINO would carry out the orders of defendant NANCY DUARTE inside NCCF from at least no later than September 1, 2014 through at least no earlier than September 6, 2014.

xv. Co-conspirator Andrew Pineda would carry out the orders of co-conspirator Genessis Blanco inside NCCF from on or about August 22, 2015, through on or about October 23, 2015.

xvi. Unindicted co-conspirator Robert Ramirez would carry out the orders of co-conspirator Kelly Jo Bell at MCJ from on or about August 19, 2015, through on or about October 14, 2015.

xvii. UICC-12 would carry out the orders of defendant MARK LANDEROS in MCJ in January 2016.

g. Defendants MIRIAM MEZA, ANA MARTINEZ, and ADRIAN ARAIZA, and co-conspirators Alondra Gomez, Alvaro Ruiz, Gail Ponce,

1 and Diana Martinez, and unindicted co-conspirators Kristen Ayala,  
2 unindicted co-conspirator 14 ("UICC-14"), unindicted co-conspirator  
3 15 ("UICC-15"), and unindicted co-conspirator 16 ("UICC-16"), would  
4 assist Mexican Mafia LACJ Enterprise members and associates in  
5 directing activities inside and outside the Los Angeles County Jail  
6 System, thereby facilitating the criminal activities of the Mexican  
7 Mafia LACJ Enterprise, including extortion and the sale of controlled  
8 substances.

12 ii. UICC-14 would pass DMM-1's directions regarding  
13 the collection and laundering of the proceeds of Mexican Mafia LACJ  
14 Enterprise activities to co-conspirator Daniel Cervantes.

18 iv. Defendant ANA MARTINEZ would assist UICC-10 by  
19 obtaining "burnout" phones, arranging the smuggling of drugs into the  
20 Los Angeles County Jail System, and collecting money for UICC-3.

21 v. Unindicted co-conspirator Kristen Ayala would  
22 assist defendant MARK LANDEROS in smuggling drugs into the Los  
23 Angeles County Jail System.

24 vi. Co-conspirator Alvaro Ruiz would assist co-  
25 conspirator Donato Gonzales by organizing shipments of drugs into the  
26 Los Angeles County Jail System, and would assist defendant JOSE  
27 LANDA-RODRIGUEZ by passing messages.

vii. Defendant ADRIAN ARAIZA would assist co-conspirator Daniel Cervantes by providing drugs to be smuggled into the Los Angeles County Jail System.

viii. UICC-15 would assist UICC-3 by moving the kitty money from co-conspirator Angel Sanchez's inmate trust account to co-conspirator Valerie Trejo.

ix. co-conspirator Gail Ponce would pass defendant HECTOR DUARTE's orders to defendant DAVID BERNARDINO.

x. UICC-16 would pass messages to and from UICC-12.

xi. Co-conspirator Diana Martinez would assist co-conspirator Gerardo Tapia in trafficking controlled substances, and in carrying out orders to commit acts of violence on behalf of Mexican Mafia LACJ Enterprise members.

h. Defendants MARK LANDEROS, DAVID DIAZ, and ANA MARTINEZ, and co-conspirators Luis Garica, Valerie Trejo, Kelly Jo Bell, Marlon Cornejo, Angel Sanchez, Juan Reyes, Richard Bailey, Michael Bennett, Edwin Ayala, and David Villalobos, and others known and unknown to the Grand Jury, would carry out the orders and business of the Mexican Mafia LACJ Enterprise in furtherance of its criminal activities, including extortion and the sale of controlled substances.

i. Defendant MARK LANDEROS and others known and unknown to the Grand Jury would engage in acts of violence inside the Los Angeles County Jail System to enforce Mexican Mafia rules and discipline, to collect debts on behalf of the Mexican Mafia LACJ Enterprise, including proceeds from the sale of controlled substances, and to extort on behalf of the Mexican Mafia LACJ Enterprise.

ii. Defendant DAVID DIAZ and others known and unknown to the Grand Jury would engage in acts of violence outside of the Los Angeles County Jail System on behalf of defendant JOSE LANDA-RODRIGUEZ.

iii. Defendant ANA MARTINEZ, and co-conspirators Valerie Trejo, Kelly Jo Bell, and Richard Bailey, and others known and unknown to the grand jury would assist in the smuggling of drugs into the Los Angeles County Jail System.

iv. Unindicted co-conspirators known and unknown to the Grand Jury would smuggle drugs into the Los Angeles County Jail System.

v. Co-conspirators Marlon Cornejo, Juan Reyes, Michael Bennett, and Edwin Ayala, and others known and unknown to the grand jury would smuggle drugs within the Los Angeles County Jail System.

vi. Co-conspirators Marlon Cornejo, Juan Reyes, Michael Bennett, and Edwin Ayala, and others known and unknown to the grand jury would smuggle written communications within the Los Angeles County Jail System.

vi. Co-conspirator Angel Sanchez would allow his inmate trust account to be used to move and launder Mexican Mafia LACJ Enterprise proceeds.

## F. OVERT ACTS

10. In furtherance of the conspiracy and to accomplish its object, on or about the following dates, defendants JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUÑOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA

1 MARTINEZ, ADRIAN ARAIZA, and DAVID DIAZ, and others known and unknown  
2 to the Grand Jury, committed various overt acts within the Central  
3 District of California, and elsewhere, including, but not limited to,  
4 the following:

5 Smuggling and Possession of Cocaine and Methamphetamine within LACJ  
6 and Collection of the Thirds Tax

7       Overt Act No. 1:    On or before September 10, 2012, J.M.  
8 possessed and distributed cocaine and methamphetamine within MCJ.

9       Overt Act No. 2:    On or before September 10, 2012, J.M. paid  
10 his thirds tax on the cocaine and methamphetamine to UICC-1.

11       Overt Act No. 3:    On September 10, 2012, co-conspirator Marlon  
12 Cornejo possessed J.M.'s thirds tax, consisting of approximately 2.25  
13 grams of cocaine and .09 grams of methamphetamine, in order to give  
14 it to UICC-1.

15       Overt Act No. 4:    On September 10, 2012, J.M. possessed  
16 approximately .15 grams of cocaine within LACJ with intent to  
17 distribute.

18 Laundering of Money from LACJ

19       Overt Act No. 5:    From August 22, 2012, through at least May  
20 9, 2013, co-conspirator Alondra Gomez opened and maintained a post  
21 office box for the purpose of collecting payments from Mexican Mafia  
22 LACJ Enterprise activities.

23       Overt Act No. 6:    On October 22, 2012, co-conspirator Daniel  
24 Cervantes met with a person he believed to be a criminal associate,  
25 but who was actually an undercover agent from Homeland Security  
26 Investigations (the "HSI UC"), to launder the proceeds of Mexican  
27 Mafia LACJ Enterprise activities.

Overt Act No. 7: On October 22, 2012, co-conspirator Daniel Cervantes gave \$9,239 in money orders representing proceeds of Mexican Mafia LACJ Enterprise activities to the HSI UC for the HSI UC to launder by negotiating the money orders in exchange

Overt Act No. 8: On October 22, 2012, co-conspirator Daniel Cervantes received from the HSI UC approximately \$8,315 in cash representing the proceeds from the negotiation of the money orders.

## Laundering of Money from LACJ

Overt Act No. 9: On November 5, 2012, co-conspirator Daniel Cervantes met with the HSI UC and gave approximately \$11,032 in money orders representing proceeds of Mexican Mafia LACJ Enterprise activities to the HSI UC for the HSI UC to launder by negotiating the money orders in exchange for a fee.

Overt Act No. 10: On November 6, 2012, co-conspirator Daniel Cervantes received from the HSI UC approximately \$9,928 in cash representing the proceeds from the negotiation of the money orders.

## Assault of R.G. for Interfering with Drug Trafficking

Overt Act No. 11: Prior to December 6, 2012, defendant CECILIA VIRGEN ordered co-conspirator Jose Flores to have R.G. assaulted for violating Mexican Mafia rules by opening drugs that belonged to the Mexican Mafia LACJ Enterprise without authorization.

Overt Act No. 12: On or before December 6, 2012, co-conspirator Jose Flores ordered that R.G. be assaulted for violating Mexican Mafia rules by opening drugs that belonged to the Mexican Mafia LACJ Enterprise without authorization.

Overt Act No. 13: On December 6, 2012, unindicted co-conspirators assaulted R.G. on co-conspirator Jose Flores's orders.

1       Overt Act No. 14:   On December 20, 2012, in a recorded  
2 telephone call, defendant CECILIA VIRGEN advised co-conspirator Jose  
3 Flores that R.G. had been assaulted.

4       Overt Act No. 15:   On December 20, 2012, in a recorded  
5 telephone call, defendant CECILIA VIRGEN ordered that R.G. be  
6 assaulted again, and co-conspirator Jose Flores suggested that the  
7 assault be for 39 seconds.

8       Laundering of Money from LACJ

9       Overt Act No. 16:   On November 9, 2012, UICC-14 called co-  
10 conspirator Daniel Cervantes from LACJ, and in coded language during  
11 this recorded telephone call, co-conspirator Daniel Cervantes told  
12 UICC-14 that he had \$13,000 in proceeds of Mexican Mafia LACJ  
13 Enterprise activities and asked what he should do with it.

14       Overt Act No. 17:   On November 9, 2012, UICC-14 asked DMM-1  
15 what co-conspirator Daniel Cervantes should do with the \$13,000.

16       Overt Act No. 18:   On November 9, 2012, in a recorded telephone  
17 conversation, UICC-14 passed on to co-conspirator Daniel Cervantes  
18 DMM-1's directions that co-conspirator Daniel Cervantes should  
19 launder all \$13,000 and that \$12,000 of Mexican Mafia LACJ Enterprise  
20 proceeds be given to DMM-1's wife.

21       Overt Act No. 19:   On December 6, 2012, co-conspirator Daniel  
22 Cervantes met with the HSI UC and gave approximately \$13,000 in money  
23 orders representing proceeds of Mexican Mafia LACJ Enterprise  
24 activities in LACJ to the HSI UC for the HSI UC to launder by  
25 negotiating the money orders in exchange for a fee.

26       Overt Act No. 20:   On December 7, 2012, co-conspirator Daniel  
27 Cervantes received from the HSI UC approximately \$10,237 in cash  
28

1 representing the proceeds from the negotiation of the money orders  
2 and approximately \$2,100 in uncashed money orders.

3 Overt Act No. 21: On December 13, 2012, co-conspirator Daniel  
4 Cervantes arranged for the HSI UC to meet with co-conspirator Alondra  
5 Gomez for the purpose of laundering approximately \$2,100 in money  
6 orders representing proceeds from Mexican Mafia LACJ Enterprise  
7 activities.

8 Overt Act No. 22: On December 13, 2012, co-conspirator Alondra  
9 Gomez met with the HSI UC and negotiated approximately \$2,100 in  
10 money orders representing proceeds of Mexican Mafia LACJ Enterprise  
11 activities in LACJ.

12 Extortion and Assault of J.D.

13 Overt Act No. 23: On December 18, 2012, in a recorded  
14 telephone call, defendant CECILIA VIRGEN asked UICC-3 to collect a  
15 debt owed to her by J.D. or to assault J.D. if he did not pay.

16 Overt Act No. 24: From December 18, 2012, through February 11,  
17 2013, UICC-3 arranged for J.D. to be repeatedly assaulted in LACJ for  
18 failing to pay a debt.

19 Overt Act No. 25: Prior to January 18, 2013, unindicted co-  
20 conspirator 18 ("UICC-18") allowed his LACJ inmate trust account to  
21 be used to collect the debt from J.D.

22 Overt Act No. 26: On January 25, 2013, UICC-3 told defendant  
23 CECILIA VIRGEN that \$200 from J.D. had been placed on UICC-18's LACJ  
24 inmate trust account.

25 Overt Act No. 27: On January 29, 2013, in a recorded telephone  
26 call, defendant CECILIA VIRGEN asked UICC-3 if J.D. had paid his  
27 debt.

1       Overt Act No. 28: On February 7, 2013, in a recorded telephone  
2 call, UICC-3 instructed co-conspirator Valerie Trejo to pass a  
3 message to defendant CECILIA VIRGEN that J.D. had not paid his debt,  
4 and co-conspirator Valerie Trejo confirmed that she sent the message.

5       Overt Act No. 29: On February 11, 2013, in a recorded  
6 telephone call, UICC-3 again instructed co-conspirator Valerie Trejo  
7 to tell defendant CECILIA VIRGEN that J.D. had not paid the debt.

8       Overt Act No. 30: On February 11, 2013, in a recorded  
9 telephone call, UICC-3 told defendant CECILIA VIRGEN that J.D. had  
10 not paid the debt but had been assaulted, and UICC-3 and defendant  
11 CECILIA VIRGEN discussed where they could find J.D. outside of LACJ.  
12 Extortion of L.O.

13       Overt Act No. 31: From December 17, 2012, through December 30,  
14 2012, UICC-3 extorted approximately \$2,000 worth of heroin from L.O.

15       Overt Act No. 32: From December 19, 2012, through December 30,  
16 2012, in recorded telephone calls from UICC-3, defendant CECILIA  
17 VIRGEN discussed her plans to obtain drugs provided by L.O. as a  
18 result of extortion and to have the drugs smuggled into LACJ.

19 Smuggling of Heroin and Methamphetamine within LACJ

20       Overt Act No. 33: On December 19, 2012, UICC-3 arranged to  
21 transport approximately 5.33 grams of black tar heroin and 1.65 grams  
22 of a mixture or substance containing a detectable amount of  
23 methamphetamine from MCJ to NCCF to be sold on behalf of the Mexican  
24 Mafia LACJ Enterprise.

25       Overt Act No. 34: On December 19, 2012, co-conspirator Juan  
26 Reyes transported approximately 5.33 grams of black tar heroin and  
27 1.65 grams of a mixture or substance containing a detectable amount

of methamphetamine from MCJ to NCCF in his body on behalf of the Mexican Mafia LACJ Enterprise.

Overt Act No. 35: On December 23, 2012, in a recorded telephone call, defendant CECILIA VIRGEN informed UICC-3 that the black tar heroin and methamphetamine carried by co-conspirator Juan Reyes had been seized by law enforcement.

## Assault and Extortion of S.M.

Overt Act No. 36: Prior to December 21, 2012, defendant CECILIA VIRGEN ordered that S.M. be assaulted because he was in bad standing with the Mexican Mafia LACJ Enterprise.

Overt Act No. 37: On December 21, 2012, unindicted co-conspirators assaulted S.M.

## Smuggling of Heroin into LACJ

Overt Act No. 38: From October 26, 2012, through October 31, 2012, in recorded telephone calls, UICC-8 and unindicted co-conspirator 19 ("UICC-19") arranged for an attorney, unindicted co-conspirator 20 ("UICC-20") to bring heroin into LACJ by hiding the heroin in a greeting card that UICC-19 would give to UICC-20 to pass to UICC-8.

Overt Act No. 39: Prior to and on December 22, 2012, in recorded telephone calls, defendant CECILIA VIRGEN discussed with UICC-8 the plan to smuggle heroin into LACJ, and defendant CECILIA VIRGEN directed UICC-8 to allow her to add approximately one-half ounce of heroin into the heroin-filled greeting card.

Overt Act No. 40: On December 24, 2012, in a recorded telephone conversation, UICC-8 and UICC-19 ordered approximately one and one-half ounces of heroin from unindicted co-conspirator 21

1 ("UICC-21") and discussed that the destination for the heroin was  
2 LACJ.

3 Overt Act No. 41: On December 25, 2012, UICC-19 purchased  
4 approximately one and one-half ounces of heroin from UICC-21.

5 Overt Act No. 42: On December 28, 2012, as arranged by  
6 defendant CECILIA VIRGIN, UICC-8, UICC-19, UICC-20 attempted to  
7 smuggle a greeting card containing approximately 23.8 grams of heroin  
8 into LACJ, but were caught by LASD deputies.

9 Collection of the Kitty

10 Overt Act No. 43: From July 14, 2012, through May 22, 2013,  
11 defendant MIRIAM MEZA collected kitty proceeds, drug proceeds, and  
12 other extortion proceeds from LACJ and placed that money onto the  
13 inmate trust accounts of unindicted co-conspirators UICC-3 and  
14 UICC-18.

15 Orders to Assault R.G. and "Stomper" from the Rockwood gang because  
16 of R.G.'s Interference with Drug Trafficking

17 Overt Act No. 44: From December 29, 2012, through December 31,  
18 2012, in recorded telephone calls from co-conspirator Jose Flores,  
19 defendant CECILIA VIRGEN ordered that R.G. be assaulted for  
20 protesting his previous assault and that a Sureno known as "Stomper"  
21 from the Rockwood gang be assaulted for speaking up on behalf of R.G.  
22

Money Laundering Using an Inmate Trust Account

23 Overt Act No. 45: On or before December 27, 2012, UICC-7  
24 directed his subordinates to put the kitty and drug money onto the  
25 inmate trust account of co-conspirator Angel Sanchez.

26 Overt Act No. 46: From December 23, 2012, through January 31,  
27 2013, -conspirator Angel Sanchez allowed his LACJ inmate trust

1 account to be used by the Mexican Mafia LACJ Enterprise to launder  
2 the kitty and drug money.

3 Overt Act No. 47: On or before January 25, 2013, defendant  
4 MARK LANDEROS sent a kite to inform UICC-3 that the kitty money was  
5 being placed on the LACJ inmate trust account of -conspirator Angel  
6 Sanchez.

7 Overt Act No. 48: From December 23, 2012, through January 19,  
8 2013, in recorded telephone conversations, -conspirator Angel Sanchez  
9 and UICC-15 discussed withdrawing the Mexican Mafia LACJ Enterprise's  
10 money from -conspirator Angel Sanchez's LACJ inmate trust account.

11 Overt Act No. 49: From on or before January 11, 2013, through  
12 January 31, 2013, UICC-15, withdrew the kitty and drug money from -  
13 conspirator Angel Sanchez's LACJ inmate trust account to be given to  
14 co-conspirator Valerie Trejo for UICC-3.

15 Laundering of Money from LACJ

16 Overt Act No. 50: On January 9, 2013, co-conspirator Daniel  
17 Cervantes met with and gave approximately \$10,046 in money orders  
18 representing proceeds of Mexican Mafia LACJ Enterprise activities to  
19 the HSI UC for the HSI UC to launder by negotiating the money orders  
20 in exchange for a fee.

21 Overt Act No. 51: On January 10, 2013, co-conspirator Daniel  
22 Cervantes received from the the HSI UC approximately \$9,414 in cash  
23 representing the proceeds from the negotiation of the money orders.

24 Attempted Smuggling of Marijuana and Correspondence Related to

25 Extortion and Money Laundering into LACJ

26 Overt Act No. 52: On January 18, 2013, unindicted co-  
27 conspirator 22 ("UICC-22") transported, in his body, marijuana, a

1 kite discussing extortion and money laundering, and three roll calls  
2 from UICC-7 intended for UICC-1.

3 Smuggling of Heroin and Methamphetamine into LACJ

4       Overt Act No. 53: From December 19, 2012, through January 22,  
5 2013, defendant CECILIA VIRGEN, co-conspirator Jose Flores, UICC-3  
6 and unindicted co-conspirator 23 ("UICC-23"), arranged to smuggle  
7 approximately 64.6 grams of heroin and approximately 36.7 grams of  
8 methamphetamine into LACJ on behalf of DMM-1.

9       Overt Act No. 54: On January 19, 2013, at defendant CECILIA  
10 VIRGEN's direction, UICC-23 possessed and smuggled in his body at  
11 least 64.6 grams of heroin and 36.7 grams of methamphetamine into  
12 LACJ for DMM-1.

13       Overt Act No. 55: On January 22, 2013, UICC-23 gave an unknown  
14 amount of a controlled substance to UICC-3 in LACJ.

15 Possession of Methamphetamine, Cash, and Firearms

16       Overt Act No. 56: On January 29, 2013, defendant ADRIAN ARAIZA  
17 possessed with intent to distribute approximately 6,317.7 grams of  
18 methamphetamine, on behalf of DMM-1.

19       Overt Act No. 57: On January 29, 2013, defendant ADRIAN ARAIZA  
20 possessed two firearms in order to protect the approximately 6,317.7  
21 grams of methamphetamine.

22       Overt Act No. 58: On January 29, 2013, defendant defendant  
23 ADRIAN ARAIZA possessed approximately \$444,372 in drug proceeds on  
24 behalf of DMM-1.

25 Attempted Murder of M.A.

26       Overt Act No. 59: On February 7, 2013, co-conspirator Luis  
27 Garcia attempted to kill M.A. in LACJ because M.A. was on the "Green  
28 Light" list.

## Assault and Extortion of S.M.

Overt Act No. 60: From February 10, 2013, through February 13, 2013, in recorded telephone calls, defendant CECILIA VIRGEN and co-conspirator Mark Levy arranged for S.M. to be assaulted until he made a payment to the Mexican Mafia LACJ Enterprise.

Overt Act No. 61: On February 13, 2013, unindicted coconspirators assaulted S.M. because of his bad standing with the Mexican Mafia LACJ Enterprise.

## Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

Overt Act No. 62: From January 22, 2013, through February 28, 2013, defendant CECILIA VIRGEN, co-conspirators Valerie Trejo, Richard Bailey, Richard Griego, and UICC-3 arranged for heroin, methamphetamine and marijuana to be smuggled to UICC-3 in LACJ on behalf of DMM-1.

Overt Act No. 63: On February 12, 2013, co-conspirator Richard Bailey packaged methamphetamine, heroin, and marijuana for unindicted co-conspirator Richard Grieqo to smuggle into LACJ.

Overt Act No. 64: On February 28, 2013, unindicted co-conspirator Richard Griego possessed in his body and attempted to smuggle approximately 26.2 grams of pure methamphetamine, approximately 62.9 grams of heroin, and approximately 11.75 grams of marijuana into LACJ for UICC-3 and DMM-1.

Assault of I.E. for Taking Mexican Mafia LACJ Enterprise Extortion  
Proceeds and for Cooperating with Law Enforcement

Overt Act No. 65: On March 15, 2013, unindicted co-conspirators assaulted I.E. at the direction of defendant VALENTIN CORDOVA.

1       Overt Act No. 66: On April 12, 2013, in a recorded telephone  
2 call, defendant VALENTIN CORDOVA reported to defendant CECILIA VIRGEN  
3 that he had ordered that I.E. be assaulted because I.E. had been  
4 taking Mexican Mafia LACJ Enterprise proceeds and had told LACJ  
5 deputies about a previous assault on him, so that defendant CECILIA  
6 VIRGEN could inform other facilities that I.E. should be assaulted.

7       Assault and Extortion of S.M.

8       Overt Act No. 67: Prior to March 21, 2013, defendant CECILIA  
9 VIRGEN ordered that S.M. be assaulted until he made a payment to the  
10 Mexican Mafia LACJ Enterprise.

11       Overt Act No. 68: On March 21, 2013, unindicted co-  
12 conspirators assaulted S.M. because of his bad standing with the  
13 Mexican Mafia LACJ Enterprise.

14       Assault of R.K. and Planned Assault of G.S. for Cooperating with Law  
15 Enforcement

16       Overt Act No. 69: On or before March 25, 2013, UICC-11 ordered  
17 that R.K. be assaulted because UICC-11 suspected that R.K. had  
18 cooperated with law enforcement.

19       Overt Act No. 70: On March 25, 2013, unindicted co-  
20 conspirators assaulted R.K. on UICC-11's orders because of R.K.'s  
21 suspected cooperation with law enforcement.

22       Overt Act No. 71: From April 6, 2013, through May 21, 2013,  
23 UICC-3 and defendant CECILIA VIRGEN discussed, in recorded telephone  
24 calls, locating G.S. in order to have him assaulted as discipline for  
25 his suspected cooperation with law enforcement.

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1        Assault of A.R. in Order to Commit Extortion

2        Overt Act No. 72:    On March 31, 2013, defendant MARK LANDEROS  
3 and unindicted co-conspirator 25 ("UICC-25") assaulted A.R. because  
4 they believed A.R. was in LACJ for a sexual assault.

5        Assault and Extortion of J.M.-2

6        Overt Act No. 73:    On or before April 2, 2013, defendant  
7 VALENTIN CORDOVA ordered the assault of J.M.-2 because J.M.-2 lied  
8 about his identity to the Mexican Mafia LACJ Enterprise.

9        Overt Act No. 74:    On April 2, 2013, unindicted co-conspirators  
10 assaulted J.M.-2 because of his bad standing with the Mexican Mafia  
11 LACJ Enterprise.

12        Overt Act No. 75:    On April 6, 2013, in a recorded telephone  
13 call, defendant CECILIA VIRGEN ordered that J.M.-2 be assaulted until  
14 he pays his debt to the Mexican Mafia LACJ Enterprise.

15        Extortion of J.M.-3

16        Overt Act No. 76:    From April 6, 2013, through May 20, 2013, in  
17 recorded telephone conversations, defendant CECILIA VIRGEN spoke to  
18 defendant VALENTIN CORDOVA and co-conspirators Frankie Megorado and  
19 UICC-3 about finding J.M.-3 in LACJ to collect a debt that J.M.-3  
20 owed to the Mexican Mafia LACJ Enterprise.

21        Overt Act No. 77:    On April 6, 2013, in a recorded telephone  
22 conversation, defendant VALENTIN CORDOVA told defendant CECILIA  
23 VIRGEN he would look for J.M.-3.

24        Overt Act No. 78:    On May 16, 2013, in a recorded telephone  
25 conversation, UICC-3 told defendant CECILIA VIRGEN that J.M.-3 had  
26 paid his debt to the Mexican Mafia.

27        Overt Act No. 79:    On May 19, 2013, in a recorded telephone  
28 conversation, defendant CECILIA VIRGEN told co-conspirator Frankie

1 Megorado that J.M.-3 still owed money to the Mexican Mafia, but that  
2 she was going to allow J.M.-3 to pay \$400 instead of \$600, and co-  
3 conspirator Frankie Megorado provided J.M.-3's name and booking  
4 number to defendant CECILIA VIRGEN so that he could be located.

5 Assault of Co-conspirator Miguel Garcia for not Remitting the Proper  
6 Drug and Extortion Proceeds

7       Overt Act No. 80: From April 5, 2013, through April 12, 2013,  
8 in recorded telephone conversations, defendant CECILIA VIRGEN ordered  
9 co-conspirator Jose Olea to assault co-conspirator Miguel Garcia and  
10 to replace co-conspirator Miguel Garcia as the shot-caller of the 700  
11 floor of NCCF because co-conspirator Miguel Garcia had not been  
12 properly remitting extortion and drug proceeds and because co-  
13 conspirator Miguel Garcia's wife had disrespected defendant CECILIA  
14 VIRGEN during the dispute over the proceeds.

15       Overt Act No. 81: On April 9, 2013, unidentified co-  
16 conspirators assaulted co-conspirator Miguel Garcia as directed by  
17 co-conspirator Jose Olea.

18       Overt Act No. 82: On April 10, 2013, in a recorded telephone  
19 conversation, defendant CECILIA VIRGEN directed co-conspirator Jose  
20 Olea to continue assaulting co-conspirator Miguel Garcia until co-  
21 conspirator Miguel Garcia surrendered the roll calls, the address to  
22 which to send kitty and other money, phone numbers, and calling cards  
23 to co-conspirator Jose Olea.

24       Overt Act No. 83: On April 12, 2013, after co-conspirator Jose  
25 Olea told defendant CECILIA VIRGEN in a recorded telephone call that  
26 co-conspirator Miguel Garcia had complied, defendant CECILIA VIRGEN  
27 ordered that co-conspirator Miguel Garcia be assaulted until he left  
28 the 700 floor of NCCF.

1       Overt Act No. 84:   On April 12, 2013, co-conspirator Jose Olea  
2 arranged for co-conspirator Miguel Garcia to be assaulted again.

3       Overt Act No. 85:   On April 12, 2013, unidentified co-  
4 conspirators assaulted co-conspirator Miguel Garcia as directed by  
5 co-conspirator Jose Olea.

6 Assault of L.M. for Attempting to Evade Extortion

7       Overt Act No. 86:   On April 23, 2013, co-conspirators Mark  
8 Martinez, Amo West, Ramiro Andrade, Oswaldo Quintero, Nicholas  
9 Escarcega, Christian Fuentes, Francisco Ruiz, and Jose Vera assaulted  
10 L.M. in order to maintain Mexican Mafia LACJ Enterprise discipline  
11 and punish L.M. for attempting to evade extortion.

12       Overt Act No. 87:   On April 23, 2013, unknown co-conspirators  
13 moved the unconscious body of L.M. in order to prevent the detection  
14 of the beating of L.M.

15       Overt Act No. 88:   On April 23, 2013, unindicted co-conspirator  
16 Ramiro Andrade and other unknown co-conspirators cleaned blood and  
17 other evidence of an assault from the location of the beating of L.M.  
18 to prevent the detection of the beating of L.M..

19 Assaults of J.V. and M.M.F.

20       Overt Act No. 89:   On April 28, 2013, an unindicted co-  
21 conspirator assaulted J.V. for volunteering for and backing out of an  
22 agreed upon assault.

23       Overt Act No. 90:   On April 28, 2013, unindicted co-  
24 conspirators assaulted M.M.F. for violating a Mexican Mafia LACJ  
25 Enterprise rule against associating with African-American inmates.

26 Laundering of Money from LACJ

27       Overt Act No. 91:   On May 9, 2013, co-conspirator Daniel  
28 Cervantes met with and gave the HSI UC approximately \$7,976 in money

1 orders representing proceeds of Mexican Mafia LACJ Enterprise  
2 activities for the HSI UC to launder by negotiating the money orders  
3 in exchange for a fee.

4       Overt Act No. 92:   On May 10, 2013, co-conspirator Daniel  
5 Cervantes received from the ICE UC \$7,178 in cash representing  
6 proceeds from the negotiation of the money orders.

7       Possession of Methamphetamine and Mexican Mafia LACJ Enterprise  
8       Correspondence Regarding Extortion in LACJ

9       Overt Act No. 93:   On May 13, 2013, in LACJ, co-conspirator  
10 Michael Bennett possessed inside his body approximately 5.5 grams of  
11 methamphetamine, which he intended to give to UICC-1.

12       Overt Act No. 94:   On May 13, 2013, co-conspirator Michael  
13 Bennett carried a message regarding extortion and leadership within  
14 LACJ in his body from UICC-3 intended for UICC-1.

15       Overt Act No. 95:   On May 13, 2013, UICC-3 reported to UICC-1  
16 that MCJ had paid \$1,500 in kitty money, that he had fined a Sureno  
17 \$600 and ordered that the Sureno be assaulted for losing drugs, and  
18 identified various other shot-callers within LACJ.

19       Possession of Cocaine and Methamphetamine and Correspondence Related  
20       to Drug Trafficking and Extortion

21       Overt Act No. 96:   On May 15, 2013, in LACJ, co-conspirator  
22 Edwin Ayala possessed with the intent to distribute to others on  
23 behalf of the Mexican Mafia LACJ Enterprise approximately .6 grams of  
24 cocaine base in the form of crack cocaine and approximately .54 grams  
25 of methamphetamine.

26       Overt Act No. 97:   On May 15, 2013, co-conspirator Edwin Ayala  
27 possessed two kites from UICC-11 intended for UICC-3 and unindicted  
28 co-conspirator 27 ("UICC-27").

1       Conspiracy to Extort and Assault J.J.

2       Overt Act No. 98:   On May 17, 2013, in a recorded telephone  
3 call, defendants CECILIA VIRGEN and VALENTIN CORDOVA, and co-  
4 conspirator Frankie Megorado, discussed having J.J. assaulted for  
5 interfering with the orderly administration of Mexican Mafia LACJ  
6 Enterprise operations, including the handling of drug and extortion  
7 proceeds.

8       Overt Act No. 99:   On May 20, 2013, in a recorded telephone  
9 call, defendant CECILIA VIRGEN directed co-conspirator Frankie  
10 Megorado to arrange the assault of J.J. in order to maintain Mexican  
11 Mafia LACJ Enterprise discipline.

12       Overt Act No. 100:   On May 20, 2013, in a recorded telephone  
13 call, co-conspirator Frankie Megorado agreed to arrange the assault  
14 of J.J. as directed by defendant CECILIA VIRGEN.

15       Possession of Mexican Mafia LACJ Enterprise Records

16       Overt Act No. 101:   On May 22, 2013, defendant CECILIA VIRGEN  
17 possessed records of the Mexican Mafia LACJ Enterprise's racketeering  
18 activities in LACJ, including drug trafficking and extortion.

19       Smuggling of Methamphetamine, Heroin and Marijuana into LACJ

20       Overt Act No. 102:   From May 22, 2013, through May 30, 2013, in  
21 recorded telephone conversations, UICC-10 and defendant ANA MARTINEZ  
22 coordinated the smuggling of heroin, methamphetamine, and marijuana  
23 to UICC-3 in LACJ; UICC-10 directed defendant ANA MARTINEZ to mark  
24 the drugs with "Kahn" to indicate that they were for UICC-3; and  
25 UICC-10 directed defendant ANA MARTINEZ to package the drugs in the  
26 cutoff fingers of black latex gloves.

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1       Overt Act No. 103: On May 23, 2013, defendant ANA MARTINEZ  
2 obtained heroin, methamphetamine, and marijuana from an unknown  
3 supplier and packaged the drugs for smuggling into LACJ.

4       Overt Act No. 104: From May 2013 through August 7, 2013,  
5 defendant ANA MARTINEZ possessed digital scales and narcotics  
6 packaging to facilitate the smuggling of drugs into LACJ on behalf of  
7 the Mexican Mafia LACJ Enterprise.

8 Money Laundering

9       Overt Act No. 105: On May 24, 2013, in a recorded telephone  
10 conversation, UICC-10 directed defendant ANA MARTINEZ to transfer  
11 \$500 of Mexican Mafia LACJ Enterprise drug money to co-conspirator  
12 Valerie Trejo.

13       Overt Act No. 106: On May 24, 2013, defendant ANA MARTINEZ  
14 transferred \$500 of Mexican Mafia LACJ Enterprise drug money to co-  
15 conspirator Valerie Trejo via money order.

16 Identity Theft and Access Device Fraud

17       Overt Act No. 107: From May 2013 through at least August 2013,  
18 defendant ANA MARTINEZ obtained identity profiles, opened fraudulent  
19 Verizon phone accounts based on those profiles, and provided those  
20 phone numbers to UICC-10 to give to other Mexican Mafia LACJ  
21 Enterprise associates so that they could carry out Mexican Mafia LACJ  
22 Enterprise business by making free phone calls.

23       Overt Act No. 108: On August 7, 2013, defendant ANA MARTINEZ  
24 possessed in her residence hundreds of stolen identity profiles to  
25 use to open fraudulent phone accounts to further Mexican Mafia LACJ  
26 Enterprise communications to and from LACJ.

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1      Defendant JOSE LANDA-RODRIGUEZ takes over Mexican Mafia LACJ  
2      Enterprise Operations, Including Drug Trafficking and Extortion

3            Overt Act No. 109: Beginning on June 21, 2013, following the  
4      death of DMM-1, defendant JOSE LANDA-RODRIGUEZ took over all Mexican  
5      Mafia LACJ Enterprise operations within LACJ.

6            Overt Act No. 110: Beginning June 21, 2013, following the death  
7      of DMM-1, UICC-9 assumed a position as a top lieutenant to defendant  
8      JOSE LANDA-RODRIGUEZ for running Mexican Mafia LACJ Enterprise  
9      operations in LACJ.

10           Overt Act No. 111: Beginning June 21, 2013, following the death  
11     of DMM-1, co-conspirator Miguel Calderon assumed a position as an  
12     out-of-custody "secretary" for defendant JOSE LANDA-RODRIGUEZ to  
13     facilitate Mexican Mafia LACJ Enterprise operations in LACJ.

14           Overt Act No. 112: Beginning June 21, 2013, following the death  
15     of DMM-1, UICC-4 took over as the shot-caller of the 800 and 900  
16     dorms in NCCF to run Mexican Mafia LACJ Enterprise operations for  
17     defendant JOSE LANDA-RODRIGUEZ.

18           Overt Act No. 113: Beginning June 26, 2013, following the death  
19     of DMM-1, co-conspirator Miguel Garcia took over as the shot-caller  
20     of the 500, 600, and 700 dorms in NCCF to run Mexican Mafia LACJ  
21     Enterprise operations for defendant JOSE LANDA-RODRIGUEZ.

22           Overt Act No. 114: On June 24, 2013, defendant JOSE LANDA-  
23     RODRIGUEZ told defendant SAMANTHA RIVERA that he was taking over all  
24     of LACJ and directed defendant SAMANTHA RIVERA to inform co-  
25     conspirator Miguel Calderon.

26           Overt Act No. 115: From June 24, 2013, through at least  
27     December 18, 2015, defendant SAMANTHA RIVERA passed communications  
28     from defendant JOSE LANDA-RODRIGUEZ to other Mexican Mafia members.

Overt Act No. 116: On June 28, 2013, co-conspirator Miguel Calderon directed UICC-9 to send the kitty money to a post office box that he controlled and to send the drug and fine money to another post office box that he controlled.

Overt Act No. 117: On June 23, 2013, July 6, 2013, and July 26, 2013, co-conspirator Miguel Calderon made deposits of approximately \$200 in kitty proceeds into the LACJ inmate trust account of defendant JOSE LANDA-RODRIGUEZ.

## Smuggling of Methamphetamine into LACJ

Overt Act No. 118: From July 24, 2013, through August 14, 2013, defendant MARK LANDEROS and unindicted co-conspirators Kristen Ayala, Jonathan Rodriguez, Bryanna McCullah, Juan NMN Garcia, and unindicted co-conspirator 31 ("UICC-31") arranged to smuggle approximately one ounce of methamphetamine and one ounce of marijuana into LACJ.

Overt Act No. 119: On July 25, 2013, in a recorded telephone conversation, defendant MARK LANDEROS asked UICC-31 to smuggle drugs into LACJ.

Overt Act No. 120: On August 3, 2013, in a recorded telephone conversation between defendant MARK LANDEROS and unindicted co-conspirators Kristen Ayala and Juan NMN Garcia, defendant MARK LANDEROS asked unindicted co-conspirator Juan NMN Garcia to supply methamphetamine and marijuana, and unindicted co-conspirator Juan NMN Garcia agreed to do so and gave prices for the drugs.

Overt Act No. 121: On August 13, 2013, in a recorded telephone conversation, defendant MARK LANDEROS spoke to unindicted co-conspirator Jonathan Rodriguez and gave him instructions regarding the drugs to be smuggled into LACJ.

1       Overt Act No. 122: On August 14, 2013, acting on defendant MARK  
2 LANDEROS' instructions, unindicted co-conspirator Jonathan Rodriguez  
3 attempted to smuggle into LACJ approximately 22.7 grams of  
4 methamphetamine inside his body.

5 Juan Reyes Appointed as Shot-Caller for 800 Floor of NCCF

6       Overt Act No. 123: On or before August 7, 2013, co-conspirator  
7 Frankie Megorado sent a kite to co-conspirator Juan Reyes appointing  
8 co-conspirator Juan Reyes as shot-caller for the 800 floor of MCJ on  
9 behalf of the Mexican Mafia LACJ Enterprise, and providing  
10 instructions regarding extortion and discipline.

11 Smuggling of Heroin within LACJ

12       Overt Act No. 124: On September 24, 2013, unindicted co-  
13 conspirator 32 ("UICC-32") attempted to smuggle .39 grams of heroin  
14 from Twin Towers to co-conspirator Miguel Garcia at NCCF.

15 Laureen Garcia Acts as the Secretary for NCCF and Manuel Jimenez Acts  
16 as a Shot-Caller for NCCF by imposing Discipline and Collecting  
17 Extortion Proceeds and Laundering Them

18       Overt Act No. 125: In October 2013, co-conspirator Laureen  
19 Garcia served as the Mexican Mafia LACJ Enterprise secretary for NCCF  
20 and in that capacity ordered assaults as discipline and for  
21 violations of Mexican Mafia rules, collected "Green Dot" numbers  
22 representing proceeds from Mexican Mafia LACJ Enterprise extortion  
23 activities from co-conspirator Manuel Jimenez, and directed co-  
24 conspirator Manuel Jimenez to send extortion money to a post office  
25 box that co-conspirator Laureen Garcia controlled.

26       Overt Act No. 126: On October 3, 2013, in a recorded telephone  
27 conversation, co-conspirator Laureen Garcia appointed co-conspirator  
28 Manuel Jimenez and an unindicted co-conspirator known as "Fatboy"

1 from the Blythe Street gang to run Mexican Mafia LACJ Enterprise  
2 activities in parts of NCCF.

3 Overt Act No. 127: On October 7, 2013, in a recorded telephone  
4 conversation, co-conspirator Manuel Jimenez provided to co-  
5 conspirator Laureen Garcia the number to a Green Dot card/account  
6 that contained \$100 in Mexican Mafia LACJ Enterprise proceeds.

7 Overt Act No. 128: On October 11, 2013, in a recorded telephone  
8 conversation, co-conspirator Laureen Garcia gave the post office box  
9 address for kitty money to co-conspirator Manuel Jimenez.

10 Overt Act No. 129: On October 12, 2013, in a recorded telephone  
11 conversation, co-conspirator Laureen Garcia ordered co-conspirator  
12 Alavaro Leyva to fine a Sureno known as "Oso" \$600 for violating  
13 Mexican Mafia LACJ Enterprise rules.

14 Overt Act No. 130: On October 12, 2013, in a recorded telephone  
15 conversation, co-conspirator Alavaro Leyva told co-conspirator  
16 Laureen Garcia that he would fine the Sureno known as "Oso" \$600 and  
17 have him assaulted three times for 39 seconds, and co-conspirator  
18 Laureen Garcia agreed.

19 Overt Act No. 131: On October 14, 2013, in a recorded telephone  
20 conversation, co-conspirator Laureen Garcia gave the post office box  
21 address for kitty money to co-conspirator Alavaro Leyva.

22 Overt Act No. 132: On October 14, 2013, in a recorded telephone  
23 conversation, co-conspirator Alavaro Leyva told co-conspirator  
24 Laureen Garcia about inmates in NCCF who were causing problems and  
25 suggested that they be fined \$1,000.

26 Overt Act No. 133: On October 14, 2013, in a recorded telephone  
27 conversation, co-conspirator Laureen Garcia agreed to the \$1,000

1 fines for Oso and other inmates who were causing problems in NCCF and  
2 ordered that they be assaulted as well.

3 Overt Act No. 134: On October 27, 2013, co-conspirator Laureen  
4 Garcia put \$50 on the inmate trust account of defendant JOSE LANDA-  
5 RODRIGUEZ.

6 Overt Act No. 135: On November 1, 2013, co-conspirator Laureen  
7 Garcia possessed sixty-seven money orders representing \$3,240 in  
8 Mexican Mafia LACJ Enterprise proceeds.

9 Assault of Frankie Megorado for Failing to Run Mexican Mafia LACJ  
10 Enterprise Drug Trafficking and Extortion, Properly

11 Overt Act No. 136: On or before October 2, 2013, in a recorded  
12 telephone conversation, co-conspirator Alavaro Leyva told co-  
13 conspirator Laureen Garcia that co-conspirator Frankie Megorado  
14 should be assaulted because he was not running Mexican Mafia LACJ  
15 Enterprise operations properly, including by not remitting the proper  
16 amount of drug and extortion proceeds.

17 Overt Act No. 137: On October 2, 2013, in a recorded telephone  
18 conversation, co-conspirator Laureen Garcia ordered co-conspirator  
19 Alavaro Leyva to have co-conspirator Frankie Megorado assaulted  
20 because he was not running Mexican Mafia LACJ Enterprise operations  
21 properly.

22 Overt Act No. 138: On or after October 2, 2013, co-conspirator  
23 Alavaro Leyva ordered that co-conspirator Frankie Megorado be  
24 assaulted.

25 Overt Act No. 139: On October 5, 2013, unindicted co-  
26 conspirators assaulted co-conspirator Frankie Megorado.

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1 Greenlighting of Rafael Carrillo

2       Overt Act No. 140: On or before October 10, 2013, defendant  
3 JOSE LANDA-RODRIGUEZ ordered that UICC-1 be seriously assaulted for  
4 undermining co-conspirator Gilbert Parra's authority to collect  
5 extortion and proceeds.

6       Overt Act No. 141: On October 10, 2013, co-conspirator Gilbert  
7 Parra passed on defendant JOSE LANDA-RODRIGUEZ' order that UICC-1 be  
8 seriously assaulted to maintain the efficiency of the Mexican Mafia  
9 LACJ Enterprise's extortion and drug trafficking activities.

10       Overt Act No. 142: On October 14, 2013, co-conspirator Gilbert  
11 Parra attempted to pass on to NCCF orders that UICC-1 be seriously  
12 assaulted.

13       Overt Act No. 143: On October 14, 2013, UICC-9 attempted to  
14 smuggle into NCCF kites containing orders and instructions from co-  
15 conspirator Gilbert Parra and JOSE LANDA-RODRIGUEZ.

16 Conspiracy to Assault J.J. for Interfering with Drug Trafficking and  
17 Extortion

18       Overt Act No. 144: From October 10, 2013 through October 21,  
19 2013, defendant JOSE LANDA-RODRIGUEZ and co-conspirator Ernesto  
20 Vargas ordered that J.J. be assaulted for undermining co-conspirator  
21 Miguel Garcia's authority to collect extortion and drug proceeds.

22       Overt Act No. 145: On or before October 23, 2013, J.J. was  
23 assaulted on the orders of co-conspirator Ernesto Vargas in order to  
24 maintain the efficiency of Mexican Mafia LACJ Enterprise extortion  
25 and drug trafficking activities.

26       Overt Act No. 146: On October 23, 2013, in a recorded telephone  
27 conversation, co-conspirators Ernesto Vargas and Miguel Garcia

1 discussed J.J.'s assault as discipline for questioning co-conspirator  
2 Miguel Garcia's status in the Mexican Mafia LACJ Enterprise.

3 Jonathan Verdeja Facilitates Mexican Mafia LACJ Enterprise Activities  
4 at NCCF Including Drug Trafficking, Extortion, and Related Money  
5 Laundering

6       Overt Act No. 147: From about October 16, 2013, through  
7 December 26, 2013, co-conspirator Jonathan Verdeja acted as the  
8 facilitator for NCCF on behalf of the Mexican Mafia LACJ Enterprise;  
9 co-conspirator Jonathan Verdeja coordinated and collected kitty money  
10 and oversaw the distribution of drugs in NCCF.

11       Overt Act No. 148: On October 17, 2013, in recorded telephone  
12 conversations, co-conspirator Jonathan Verdeja called unindicted co-  
13 conspirator 33 ("UICC-33"), who gave the post office box address for  
14 Mexican Mafia LACJ Enterprise money and payments to co-conspirator  
15 Jonathan Verdeja, and co-conspirator Jonathan Verdeja agreed to send  
16 the payments to that address and directed UICC-33 to pass messages  
17 through co-conspirator Jonathan Verdeja's secretary, unindicted co-  
18 conspirator 34 ("UICC-34").

19       Overt Act No. 149: On October 18, 2013, in a recorded telephone  
20 conversation, co-conspirator Jonathan Verdeja told UICC-34 to open a  
21 post office box, told UICC-34 that he will send kitty money to her,  
22 and told UICC-34 to put the money on his inmate trust account.

23       Overt Act No. 150: On October 19, 2013, in a recorded telephone  
24 conversation, co-conspirator Jonathan Verdeja told UICC-34 to give  
25 the post office box address to NCCF shot-callers who will be calling  
26 her.

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1       Overt Act No. 151: On October 22, 2013, in a recorded telephone  
2 conversation, co-conspirator Jonathan Verdeja told UICC-34 how to  
3 instruct NCCF shot-callers to properly fill out money orders.

4       Overt Act No. 152: On October 29, 2013, in a recorded telephone  
5 conversation, co-conspirator Jonathan Verdeja told UICC-34 to give  
6 the post office box address to "Greedy" and "Laughing Boy;" UICC-34  
7 told co-conspirator Jonathan Verdeja that she had already received  
8 one money order, that she was unhappy that her name was on it, and  
9 that she preferred to deal in Green Dot numbers.

10       Overt Act No. 153: On October 30, 2013, in a recorded telephone  
11 conversation, co-conspirator Jonathan Verdeja told UICC-34 that she  
12 will be receiving twenty-eight money orders representing proceeds of  
13 Mexican Mafia LACJ Enterprise activities.

14       Overt Act No. 154: On November 10, 2013, in a recorded  
15 telephone conversation, UICC-34 told co-conspirator Jonathan Verdeja  
16 that she had received kitty payments from dorms 822 and 823, and co-  
17 conspirator Jonathan Verdeja told her to cash them.

18       Overt Act No. 155: On November 15, 2013, in a recorded  
19 telephone conversation, an unidentified female co-conspirator told  
20 co-conspirator Jonathan Verdeja that she had eight money orders  
21 representing Mexican Mafia LACJ Enterprise proceeds and co-  
22 conspirator Jonathan Verdeja told the unidentified female co-  
23 conspirator to keep two for herself and he would tell her what to do  
24 with the rest.

25       Overt Act No. 156: On November 19, 2013, in a recorded  
26 telephone conversation, co-conspirator Jonathan Verdeja told  
27 unindicted co-conspirator 35 ("UICC-35") that more money orders will  
28 be sent and that they are important.

1       Overt Act No. 157: On November 21, 2013, in a recorded  
2 telephone conversation, co-conspirator Jonathan Verdeja reported on  
3 how things were going at NCCF to co-conspirator Gilbert Parra and  
4 told unindicted co-conspirator 36 ("UICC-36") to give money orders to  
5 co-conspirator Gilbert Parra.

6       Overt Act No. 158: On December 1, 2013, in a recorded telephone  
7 conversation, co-conspirator Jonathan Verdeja told UICC-35 that she  
8 will be receiving more Green Dot numbers and UICC-35 told co-  
9 conspirator Jonathan Verdeja that she had five Green Dot numbers and  
10 one money order.

11       Overt Act No. 159: On December 4, 2013, in a recorded telephone  
12 conversation, UICC-35 told co-conspirator Jonathan Verdeja that she  
13 had one Green Dot number, five money orders, and one money-gram and  
14 that her Green Dot account had been frozen for potential money  
15 laundering.

16       Overt Act No. 160: On December 8, 2013, in a recorded telephone  
17 conversation, UICC-35 reported to co-conspirator Jonathan Verdeja  
18 that she had ten money orders and one money-gram and co-conspirator  
19 Jonathan Verdeja told her to give them to an unidentified co-  
20 conspirator.

21       Overt Act No. 161: On December 9, 2013, in a recorded telephone  
22 conversation, UICC-36 reported to co-conspirator Jonathan Verdeja  
23 that she had twenty money orders and co-conspirator Jonathan Verdeja  
24 told UICC-36 to keep one for herself and give the rest to UICC-35.

25       Overt Act No. 162: On December 9, 2013, in a recorded telephone  
26 conversation, co-conspirator Jonathan Verdeja told UICC-35 to get  
27 nineteen money orders from UICC-36 and to give them to co-conspirator  
28 Gilbert Parra.

1 Conspiracy to Assault G.S.

2       Overt Act No. 163: On October 20, 2013, in a recorded telephone  
3 conversation, co-conspirator Laureen Garcia ordered that G.S. be  
4 assaulted for mentioning defendant JOSE LANDA-RODRIGUEZ' name too  
5 much.

6 Possession of Heroin and Mexican Mafia LACJ Enterprise Correspondence  
7 within LACJ

8       Overt Act No. 164: On November 5, 2013, an UICC-2 gave six  
9 doses of heroin that was prepackaged for sale to unindicted co-  
10 conspirator 37 ("UICC-37") to sell to other persons inside LACJ.

11       Overt Act No. 165: On November 5, 2013, UICC-37 possessed six  
12 doses of heroin that was prepackaged for sale with intent to sell it  
13 to other persons inside LACJ.

14       Overt Act No. 166: On November 5, 2013, UICC-37 transported a  
15 kite written by defendant MARK LANDEROS, containing instructions that  
16 co-conspirator Luis Garcia was the facilitator for defendant JOSE  
17 LANDA-RODRIGUEZ for MCJ and Twin Towers, his orders were to be  
18 respected, and anyone expressing disobedience to him should be  
19 assaulted for 39 seconds.

20 Possession of Mexican Mafia LACJ Enterprise Correspondence Related to  
21 Drug Trafficking and Extortion

22       Overt Act No. 167: On December 4, 2013, co-conspirator Luis  
23 Garcia possessed kites directing the activities of the Mexican Mafia  
24 LACJ Enterprise inside LACJ, including drug trafficking and  
25 Extortion.

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1 Assault of UICC-32 for Losing Mexican Mafia LACJ Enterprise Heroin

2       Overt Act No. 168: On or before October 1, 2013, co-conspirator  
3 Miguel Garcia ordered that UICC-32 be assaulted as discipline for  
4 losing heroin that belonged to the Mexican Mafia LACJ Enterprise.

5       Overt Act No. 169: On October 1, 2013, in a recorded telephone  
6 conversation, co-conspirator Laureen Garcia passed on to co-  
7 conspirator Manuel Jimenez co-conspirator Miguel Garcia's order that  
8 UICC-32 be assaulted inside LACJ as discipline for losing the heroin  
9 he had attempted to smuggle into NCCF.

10       Overt Act No. 170: On or after October 1, 2013, co-conspirator  
11 Manuel Jimenez passed along the order to assault UICC-32.

12       Overt Act No. 171: On December 5, 2013, unindicted co-  
13 conspirators assaulted UICC-32.

14 Assault of O.A. for Failing to Conduct Mexican Mafia LACJ Enterprise  
15 Operations, Including Drug Trafficking and Extortion, Properly

16       Overt Act No. 172: On or before December 12, 2013, co-  
17 conspirator Luis Garcia ordered that O.A. be assaulted and replaced  
18 as a shot-caller.

19       Overt Act No. 173: On December 12, 2013, unindicted co-  
20 conspirators assaulted O.A. to remove him as a shot-caller.

21 Possession of Heroin Within LACJ and Extortion

22       Overt Act No. 174: On or before December 18, 2013, UICC-2  
23 arranged for approximately 43.7 grams of heroin to be given to  
24 unindicted co-conspirator Jonathan Rodriguez to smuggle into Twin  
25 Towers for UICC-2 and co-conspirator Luis Garcia.

26       Overt Act No. 175: On December 18, 2013, unindicted co-  
27 conspirator Jonathan Rodriguez possessed approximately 43.7 grams of

1 heroin with intent to distribute it to others on behalf of defendant  
2 JOSE LANDA-RODRIGUEZ.

3 Overt Act No. 176: On or before January 30, 2014, UICC-2 wrote  
4 a kite to defendant MARK LANDEROS to explain that unindicted co-  
5 conspirator Jonathan Rodriguez had been fined \$5,000 and would have  
6 to smuggle more drugs into LACJ because he lost the heroin seized  
7 from him on December 18, 2013, and that another Sureno had lost  
8 thirds in the form of two grams of methamphetamine.

9 Possession of Mexican Mafia LACJ Enterprise Material

10 Overt Act No. 177: On January 31, 2014, co-conspirator Luis  
11 Garcia possessed a razor blade, two pens, and contact information for  
12 defendants JOSE LANDA-RODRIGUEZ and SAMANTHA RIVERA and others.

13 Defendant GABRIEL ZENDEJAS-CHAVEZ Hosts an Eme Meeting at his Law  
14 Office

15 Overt Act No. 178: On February 4, 2014, defendant GABRIEL  
16 ZENDEJAS-CHAVEZ met with defendant RAFAEL LEMUS, co-conspirator  
17 Miguel Rodriguez, DMM-2, and others in defendant GABRIEL ZENDEJAS-  
18 CHAVEZ's law office to discuss Eme business, including the passing of  
19 messages to Eme members in California State Prison by defendant  
20 GABRIEL ZENDEJAS-CHAVEZ, the passing of messages to defendant JOSE  
21 LANDA-RODRIGUEZ, obtaining drugs for DMM-2 to have sold, and problems  
22 La Eme was having with A.E., an Eme member in bad standing, and his  
23 brother G.E.

24 Possession of Mexican Mafia LACJ Correspondence

25 Overt Act No. 179: On February 17, 2014, co-conspirator Luis  
26 Garcia possessed kites that discussed Mexican Mafia sanctioned  
27 assaults, the identity of Mexican Mafia LACJ Enterprise leaders  
28 within LACJ, and reflected that co-conspirator Luis Garcia was the

1 highest ranking shot-caller in LACJ for defendant JOSE LANDA-  
2 RODRIGUEZ.

3 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
4 Meet With and Pass Messages to Mexican Mafia Members in Pelican Bay  
5 State Prison

6 Overt Act No. 180: On February 18, 2014, defendant GABRIEL  
7 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass  
8 messages to Mexican Mafia member 1, Mexican Mafia member 2, Mexican  
9 Mafia member 3, Mexican Mafia member 4, and Mexican Mafia member 5.

10 Overt Act No. 181: On February 18, 2014, defendant GABRIEL  
11 ZENDEJAS-CHAVEZ attempted to smuggle a written message to a Mexican  
12 Mafia member at the Security Housing Unit at Pelican Bay State  
13 Prison.

14 Overt Act No. 182: On February 19, 2014, defendant GABRIEL  
15 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass  
16 messages to Mexican Mafia member 6, Mexican Mafia member 7, Mexican  
17 Mafia member 8, Mexican Mafia member 9, and Mexican Mafia member 10.  
18 Defendant GABRIEL ZENDEJAS-CHAVEZ and UICC-38 Discuss Collecting and  
19 Laundering Mexican Mafia LACJ Enterprise Proceeds

20 Overt Act No. 183: On March 27, 2014, defendant GABRIEL  
21 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to bring kitty  
22 proceeds to his law office.

23 Overt Act No. 184: On April 9, 2014, defendant GABRIEL  
24 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him  
25 \$1,000.

26 Overt Act No. 185: On April 9, 2014, defendant GABRIEL  
27 ZENDEJAS-CHAVEZ, via text-message, agreed to deliver \$300 to each of  
28

1 two Mexican Mafia members at the ADX Florence federal prison in  
2 Colorado.

3 Overt Act No. 186: On April 10, 2014, defendant GABRIEL  
4 ZENDEJAS-CHAVEZ exchanged text messages with UICC-38 in which he  
5 agreed to deliver \$400 to two persons in Colorado and to keep \$200  
6 for himself.

7 Overt Act No. 187: On April 12, 2014, defendant GABRIEL  
8 ZENDEJAS-CHAVEZ travelled to the ADX Florence federal prison in  
9 Colorado to visit Mexican Mafia member 11.

10 Overt Act No. 188: On April 14, 2014, defendant GABRIEL  
11 ZENDEJAS-CHAVEZ, via text-message, provided co-conspirator Donato  
12 Gonzales's name and booking number to UICC-38 so she could forward  
13 Mexican Mafia LACJ Enterprise proceeds to co-conspirator Donato  
14 Gonzales.

15 Overt Act No. 189: On April 18, 2014, defendant GABRIEL  
16 ZENDEJAS-CHAVEZ told UICC-38 that he had money to return to her  
17 because one of the Mexican Mafia members in Colorado could not have  
18 visitors.

19 Defendant GABRIEL ZENDEJAS-CHAVEZ Facilitates the Extortion of the  
20 Mongols Outlaw Motorcycle Gang and the Intimidation of a Victim of a  
21 Jail Stabbing

22 Overt Act No. 190: On April 8, 2014, defendant GABRIEL  
23 ZENDEJAS-CHAVEZ used his status as an attorney to meet co-conspirator  
24 Luis Garcia and discuss Mexican Mafia business including the Mexican  
25 Mafia's extortion of the Mongols outlaw motorcycle gang and that they  
26 would be extorting the Mongols outlaw motorcycle gang for \$100,000.

27 Overt Act No. 191: On April 8, 2014, defendant GABRIEL  
28 ZENDEJAS-CHAVEZ agreed to travel to Pelican Bay State Prison on June

1 25, 2014, to get support for the extortion proposal from other  
2 Mexican Mafia members.

3 Overt Act No. 192: On April 8, 2014, defendant GABRIEL  
4 ZENDEJAS-CHAVEZ agreed to contact unindicted co-conspirator 39  
5 ("UICC-39") to tell co-conspirator Luis Garcia's stabbing victim,  
6 M.A., not to cooperate with law enforcement in exchange for being  
7 taken off the "Green Light" list.

8 Overt Act No. 193: On April 8, 2014, defendant GABRIEL  
9 ZENDEJAS-CHAVEZ explained to co-conspirator Luis Garcia how to use  
10 the legal system to delay his trial in order to remain in LACJ as a  
11 facilitator.

12 Overt Act No. 194: On April 9, 2014, defendant GABRIEL  
13 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him  
14 \$1,000 and UICC-39's phone number per the instructions of defendant  
15 LUIS GARCIA.

16 Overt Act No. 195: On April 23, 2014, via text-message, UICC-38  
17 sent defendant GABRIEL ZENDEJAS-CHAVEZ a phone number for the  
18 national president of the Mongols outlaw motorcycle gang.

19 Overt Act No. 196: On June 25, 2014, defendant GABRIEL  
20 ZENDEJAS-CHAVEZ used his status as an attorney to meet with and pass  
21 messages to Mexican Mafia member 1, Mexican Mafia member 4, Mexican  
22 Mafia member 6, Mexican Mafia member 8, and Mexican Mafia member 10  
23 at Pelican Bay State Prison.

24 Possession of Mexican Mafia LACJ Enterprise Correspondence Discussing  
25 Drug Trafficking and Extortion

26 Overt Act No. 197: On April 14, 2014, co-conspirator Luis  
27 Garcia possessed in his cell in LACJ two razor blades, a syringe, and  
28 more than 100 kites discussing Mexican Mafia LACJ Enterprise

1 business, including: (1) co-conspirator Luis Garcia's status as the  
2 highest ranking shot-caller in LACJ; (2) the smuggling of drugs into  
3 LACJ; (3) the thirds tax; (4) Green Dot numbers reflecting Mexican  
4 Mafia LACJ Enterprise proceeds; and (5) a request from defendant  
5 ALVINO MUNOZ that he be allowed to play a larger role in the  
6 smuggling of drugs into LACJ on behalf of the Mexican Mafia LACJ  
7 Enterprise.

8 Defendant MARK LANDEROS Collects Thirds Taxes

9       Overt Act No. 198: On February 13, 2014, defendant MARK  
10 LANDEROS taxed R.H. the amount of approximately one-third of R.H.'s  
11 drugs for the right to sell the remainder in LACJ.

12       Overt Act No. 199: On February 14, 2014, defendant MARK  
13 LANDEROS taxed J.B. the amount of approximately one-third of J.B.'s  
14 drugs for the right to sell the remainder in LACJ.

15       Overt Act No. 200: On February 14, 2014, defendant MARK  
16 LANDEROS taxed U.R. the amount of approximately one-third of U.R.'s  
17 drugs for the right to sell the remainder in LACJ.

18       Overt Act No. 201: On February 18, 2014, defendant MARK  
19 LANDEROS taxed M.V. the amount of approximately one-third of M.V.'s  
20 drugs for the right to sell the remainder in LACJ.

21       Overt Act No. 202: On March 1, 2014, defendant MARK LANDEROS  
22 taxed L.M. the amount of approximately one-third of L.M.'s drugs for  
23 the right to sell the remainder in LACJ.

24       Overt Act No. 203: On March 2, 2014, defendant MARK LANDEROS  
25 taxed P.C.-2 the amount of approximately one-third of P.C.-2's drugs  
26 for the right to sell the remainder in LACJ.

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1       Overt Act No. 204: On March 9, 2014, defendant MARK LANDEROS  
2 taxed G.P. the amount of approximately one-third of G.P.'s drugs for  
3 the right to sell the remainder in LACJ.

4       Overt Act No. 205: On March 9, 2014, defendant MARK LANDEROS  
5 accepted drugs that were confiscated by an unidentified unindicted  
6 co-conspirator from a Sureno who did not pay the thirds tax.

7       Overt Act No. 206: On March 10, 2014, defendant MARK LANDEROS  
8 taxed G.M. the amount of approximately one-third of G.M.'s drugs for  
9 the right to sell the remainder in LACJ.

10       Overt Act No. 207: On March 11, 2014, defendant MARK LANDEROS  
11 taxed J.G. the amount of approximately one-third of J.G.'s drugs for  
12 the right to sell the remainder in LACJ.

13       Overt Act No. 208: On March 11, 2014, defendant MARK LANDEROS  
14 taxed N.G. the amount of approximately one-third of N.G.'s drugs for  
15 the right to sell the remainder in LACJ.

16       Overt Act No. 209: On March 13, 2014, defendant MARK LANDEROS  
17 taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs  
18 for the right to sell the remainder in LACJ.

19       Overt Act No. 210: On March 15, 2014, defendant MARK LANDEROS  
20 taxed R.V. the amount of approximately one-third of R.V.'s drugs for  
21 the right to sell the remainder in LACJ.

22       Overt Act No. 211: On March 16, 2014, defendant MARK LANDEROS  
23 taxed D.A. the amount of approximately one-third of D.A.'s drugs for  
24 the right to sell the remainder in LACJ.

25       Overt Act No. 212: On March 17, 2014, defendant MARK LANDEROS  
26 taxed R.R. the amount of approximately one-third of R.R.'s drugs for  
27 the right to sell the remainder in LACJ.

1       Overt Act No. 213: On March 19, 2014, defendant MARK LANDEROS  
2 taxed H.G. the amount of approximately one-third of H.G.'s drugs for  
3 the right to sell the remainder in LACJ.

4       Overt Act No. 214: On March 19, 2014, defendant MARK LANDEROS  
5 taxed D.A. the amount of approximately one-third of D.A.'s drugs for  
6 the right to sell the remainder in LACJ.

7       Overt Act No. 215: On March 23, 2014, defendant MARK LANDEROS  
8 taxed M.M. the amount of approximately one-third of M.M.'s drugs for  
9 the right to sell the remainder in LACJ.

10       Overt Act No. 216: On March 25, 2014, defendant MARK LANDEROS  
11 taxed J.E. the amount of approximately one-third of J.E.'s drugs for  
12 the right to sell the remainder in LACJ.

13       Overt Act No. 217: On March 25, 2014, defendant MARK LANDEROS  
14 taxed J.A. the amount of approximately one-third of J.A.'s drugs for  
15 the right to sell the remainder in LACJ.

16       Overt Act No. 218: On April 4, 2014, defendant MARK LANDEROS  
17 taxed J.M.-4 the amount of approximately one-third of J.M.-4's drugs  
18 for the right to sell the remainder in LACJ.

19       Overt Act No. 219: On April 8, 2014, defendant MARK LANDEROS  
20 taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs  
21 for the right to sell the remainder in LACJ.

22       Overt Act No. 220: On April 8, 2014, defendant MARK LANDEROS  
23 taxed J.H. the amount of approximately one-third of J.H.'s drugs for  
24 the right to sell the remainder in LACJ.

25       Overt Act No. 221: On April 13, 2014, defendant MARK LANDEROS  
26 taxed R.O. the amount of approximately one-third of R.O.'s drugs for  
27 the right to sell the remainder in LACJ.

1       Overt Act No. 222: On April 14, 2014, defendant MARK LANDEROS  
2 taxed L.O. the amount of approximately one-third of L.O.'s drugs for  
3 the right to sell the remainder in LACJ.

4       Overt Act No. 223: On April 15, 2014, defendant MARK LANDEROS  
5 taxed J.P. the amount of approximately one-third of J.P.'s drugs for  
6 the right to sell the remainder in LACJ.

7       Overt Act No. 224: On April 16, 2014, defendant MARK LANDEROS  
8 taxed F.M. the amount of approximately one-third of F.M.'s drugs for  
9 the right to sell the remainder in LACJ.

10       Overt Act No. 225: On April 16, 2014, defendant MARK LANDEROS  
11 taxed M.G. the amount of approximately one-third of M.G.'s drugs for  
12 the right to sell the remainder in LACJ.

13       Overt Act No. 226: On April 17, 2014, defendant MARK LANDEROS  
14 taxed S.M. the amount of approximately one-third of S.M.'s drugs for  
15 the right to sell the remainder in LACJ.

16       Overt Act No. 227: On April 18, 2014, defendant MARK LANDEROS  
17 taxed R.E. the amount of approximately one-third of R.E.'s drugs for  
18 the right to sell the remainder in LACJ.

19       Overt Act No. 228: On April 22, 2014, defendant MARK LANDEROS  
20 taxed R.A. the amount of approximately one-third of R.A.'s drugs for  
21 the right to sell the remainder in LACJ.

22       Overt Act No. 229: On April 24, 2014, defendant MARK LANDEROS  
23 taxed R.C. the amount of approximately one-third of R.C.'s drugs for  
24 the right to sell the remainder in LACJ.

25       Overt Act No. 230: On April 24, 2014, defendant MARK LANDEROS  
26 taxed co-conspirator Miguel Garcia the amount of approximately one-  
27 third of co-conspirator Miguel Garcia's drugs for the right to sell  
28 the remainder in LACJ.

1       Overt Act No. 231: On April 26, 2014, defendant MARK LANDEROS  
2 taxed P.M. the amount of approximately one-third of P.M.'s drugs for  
3 the right to sell the remainder in LACJ.

4       Overt Act No. 232: On April 28, 2014, defendant MARK LANDEROS  
5 possessed a ledger detailing his collection of the thirds tax.

6       Attempted Murder of J.B.-2 and Kidnapping and Assault and Attempted  
7 Murder of C.R.

8       Overt Act No. 233: On December 16, 2013, an unidentified co-  
9 conspirator repeatedly stabbed J.B.-2 in the head on defendant JOSE  
10 LANDA-RODRIGUEZ's orders, in retaliation for co-conspirator Alvaro  
11 Ruiz defying defendant JOSE LANDA-RODRIGUEZ.

12       Overt Act No. 234: On or before April 21, 2014, defendant JOSE  
13 LANDA-RODRIGUEZ sanctioned a kidnapping of C.R. in retaliation for  
14 co-conspirator Alvaro Ruiz defying defendant JOSE LANDA-RODRIGUEZ.

15       Overt Act No. 235: On April 21, 2014, defendant DAVID DIAZ sent  
16 a coded text message to co-conspirator Diana Martinez stating that  
17 C.R. needed to be assaulted on Mexican Mafia LACJ Enterprise orders.

18       Overt Act No. 236: On April 22, 2014, defendant DAVID DIAZ and  
19 co-conspirator Diana Martinez picked up C.R. from C.R.'s residence in  
20 the City of Pomona and drove C.R. to co-conspirator David  
21 Villalobos's residence in San Bernardino County so that co-  
22 conspirator David Villalobos could detain and assault C.R.

23       Overt Act No. 237: On April 22, 2014, co-conspirator David  
24 Villalobos obtained duct tape and attempted to restrain C.R. in the  
25 garage of his residence in San Bernardino County so that he could  
26 kill C.R.

27       Overt Act No. 238: On April 22, 2014, co-conspirator David  
28 Villalobos assaulted C.R. with the intent to kill C.R.

1                   Smuggling of Heroin and Methamphetamine into LACJ

2                   Overt Act No. 239: From April 18, 2014, through April 20, 2014,  
3 defendant GABRIEL ZENDEJAS-CHAVEZ, co-conspirators Donato Gonzales  
4 and Alvaro Ruiz, and unindicted co-conspirator Frank Herrera,  
5 arranged for heroin and methamphetamine to be smuggled into MCJ.

6                   Overt Act No. 240: On April 22, 2014, unindicted co-conspirator  
7 Martin Salazar possessed and hid approximately 2.37 grams of heroin  
8 and 7.75 grams of methamphetamine that had been smuggled into LACJ by  
9 unindicted co-conspirator Ramon Amaya on behalf of the Mexican Mafia  
10 LACJ Enterprise.

11                   Overt Act No. 241: Between April 25, 2014, and May 9, 2014, co-  
12 conspirator Donato Gonzales wrote a kite to co-conspirator Luis  
13 Garcia that the "legal team" had sent drugs to co-conspirator Donato  
14 Gonzales and asked co-conspirator Luis Garcia to look out for those  
15 drugs.

16                   Overt Act No. 242: On June 2, 2014, co-conspirator Donato  
17 Gonzales wrote a coded letter, disguised as legal mail, to defendant  
18 GABRIEL ZENDEJAS-CHAVEZ stating that he had not received the heroin  
19 and methamphetamine.

20                   Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
21                   Pass Mexican Mafia Orders Regarding Assaults, Murder, and Drug  
22                   Trafficking

23                   Overt Act No. 243: On April 22, 2014, defendant GABRIEL  
24 ZENDEJAS-CHAVEZ used his status as an attorney to meet with co-  
25 conspirator Luis Garcia and pass an order that "Dreamer" from the  
26 18th Street gang, "Demon" from 18th Street gang, and "Blanco" from  
27 the VNE gang be assaulted or killed, pass messages from Mexican Mafia  
28 members at the ADX Florence federal prison, discuss other Mexican

1 Mafia business including obtaining drugs from Mexican drug cartels,  
2 and report that he would be travelling to Mexico to work on an  
3 alliance with a drug cartel.

4       Overt Act No. 244: Between May 5, 2014, and May 11, 2014,  
5 defendant GABRIEL ZENDEJAS-CHAVEZ travelled to Mexico.

6       Defendant GABRIEL ZENDEJAS-CHAVEZ Used his Status to Pass Mexican  
7       Mafia Messages to JOSE LANDA-RODRIGUEZ

8       Overt Act No. 245: On April 22, 2014, defendant GABRIEL  
9 ZENDEJAS-CHAVEZ used his status as an attorney to meet with defendant  
10 JOSE LANDA-RODRIGUEZ and pass a message from Mexican Mafia member 11  
11 that Federal Mexican Mafia members would not be recognizing three  
12 State Mexican Mafia members as brothers.

13       Overt Act No. 246: On April 22, 2014, during his meeting with  
14 defendant JOSE LANDA-RODRIGUEZ, defendant GABRIEL ZENDEJAS-CHAVEZ  
15 passed a message from DMM-2 about removing A.E. from Mexican Mafia  
16 membership.

17       Overt Act No. 247: Between April 22, 2014, and April 25, 2014,  
18 defendant JOSE LANDA-RODRIGUEZ passed a message to co-conspirator  
19 Donato Gonzales to confirm that A.E. was being removed from Mexican  
20 Mafia membership.

21       Overt Act No. 248: From April 25, 2014, through May 9, 2014,  
22 defendant JOSE LANDA-RODRIGUEZ directed co-conspirator Luis Garcia to  
23 have defendant GABRIEL ZENDEJAS-CHAVEZ use his status as an attorney  
24 to obtain documentation that a Mexican Mafia associate was  
25 cooperating with law enforcement to justify the murder of that  
26 Mexican Mafia associate.

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1 Possession of Methamphetamine

2       Overt Act No. 249: On April 30, 2014, co-conspirator Diana  
3 Martinez drove co-conspirator Gerardo Tapia to pick up approximately  
4 four pounds, or 1,746 grams, of methamphetamine for further  
5 distribution.

6       Overt Act No. 250: On April 30, 2014, co-conspirator Gerardo  
7 Tapia possessed approximately four pounds, or 1,746 grams, of  
8 methamphetamine for further distribution.

9 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to  
10 Discuss Mexican Mafia Business

11       Overt Act No. 251: On April 28, 2014, and May 5, 2014,  
12 defendant GABRIEL ZENDEJAS-CHAVEZ used his status as an attorney to  
13 meet separately with defendant JOSE LANDA-RODRIGUEZ and co-  
14 conspirators Luis Garcia and Donato Gonzales, and at LACJ.

15       Overt Act No. 252: On April 28, 2014, and May 5, 2014, in  
16 meetings at LACJ, defendant GABRIEL ZENDEJAS-CHAVEZ informed co-  
17 conspirator Luis Garcia: that Federal Mexican Mafia members at the  
18 ADX Florence federal prison had not voted for Mexican Mafia  
19 membership for "Psycho"; that Mexican Mafia member 11 had placed  
20 "Wolf" in charge of the 18th Street gang; that Mexican Mafia member 9  
21 had advised that Deceased Mexican Mafia members 3 and 4 were feuding,  
22 and to not get dragged into the feud; and to hold off on the assaults  
23 of "Dreamer" from the 18th Street gang, "Demon" from 18th Street  
24 gang, and "Blanco" from the VNE gang, that they had previously  
25 discussed.

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Possession of Methamphetamine, Including Methamphetamine to be Smuggled into LACJ

Overt Act No. 253: On May 9, 2014, co-conspirator Gerardo Tapia possessed approximately 558.6 grams of methamphetamine in his residence with the intent to distribute the methamphetamine, including to smuggle some of it into LACJ.

Overt Act No. 254: On May 9, 2014, DMM-2 possessed, in co-conspirator Gerardo Tapia's residence, a letter concerning Mexican Mafia business written by DMM-2 and Green Dot numbers related to Mexican Mafia LACJ Enterprise activities.

JOSE LANDA-RODRIGUEZ Orders the Assault of MARK LANDEROS and the Distribution of Mexican Mafia Proceeds

Overt Act No. 255: Between April 25, 2014, and May 9, 2014, defendant JOSE LANDA-RODRIGUEZ ordered co-conspirator Luis Garcia to assault and fine defendant MARK LANDEROS for violating Mexican Mafia rules, to remove him as the shot-caller, and to place another person as a shot-caller.

Overt Act No. 256: Between April 25, 2014, and May 9, 2014, defendant JOSE LANDA-RODRIGUEZ directed the payment of thousands of dollars of Mexican Mafia proceeds to other members.

Defendant GABRIEL ZENDEJAS-CHAVEZ Informs Others that Luis Garcia had Dropped Out of the Mexican Mafia

Overt Act No. 257: On May 28, 2014, in a recorded telephone call, defendants GABRIEL ZENDEJAS-CHAVEZ and JOSE LANDA-RODRIGUEZ discussed the fact that co-conspirator Luis Garcia had "dropped-out" of the Mexican Mafia and should not be included in Mexican Mafia business any longer.

1       Overt Act No. 258: From May 28, 2014, through at least May 30,  
2 2014, defendant GABRIEL ZENDEJAS-CHAVEZ informed other co-  
3 conspirators that co-conspirator Luis Garcia had "dropped-out" of the  
4 Mexican Mafia.

5       Overt Act No. 259: Between May 18, 2014, and July 16, 2014,  
6 defendant GABRIEL ZENDEJAS-CHAVEZ wrote, in correspondence disguised  
7 as legal mail, to Mexican Mafia member 12 at Pelican Bay State Prison  
8 that co-conspirator Luis Garcia had "dropped-out" of the Mexican  
9 Mafia.

10      HECTOR DUARTE and NANCY DUARTE Carry out Mexican Mafia LACJ  
11      Enterprise Business at NCCF on behalf of DMM-2

12       Overt Act No. 260: From at least July 6, 2014, through November  
13 10, 2014, DMM-2 directed defendant HECTOR DUARTE to run NCCF on  
14 behalf of the Mexican Mafia LACJ Enterprise; defendant HECTOR DUARTE  
15 collected kitty money, assigned fines as discipline, ordered assaults  
16 to maintain discipline, and passed messages to defendant NANCY DUARTE  
17 to be passed to DMM-2's secretary, co-conspirator Miguel Rodriguez.

18       Overt Act No. 261: From at least July 6, 2014, through October  
19 23, 2014, defendant NANCY DUARTE assisted defendant HECTOR DUARTE in  
20 running the Mexican Mafia LACJ Enterprise's activities in NCCF on  
21 behalf of DMM-2, including by passing messages between defendant  
22 HECTOR DUARTE and co-conspirator Miguel Rodriguez, who was DMM-2's  
23 secretary.

24       Overt Act No. 262: On July 6, 2014, in a recorded telephone  
25 conversation, defendant HECTOR DUARTE told defendant NANCY DUARTE  
26 that, based on information from co-conspirator Chris Ferreira, an  
27 unknown Hispanic gang member was to be assaulted and extorted for  
28 \$1,000 for dealing with African-American inmates.

1       Overt Act No. 263: On July 25, 2014, in a recorded telephone  
2 conversation, co-conspirator Chris Ferreira relayed Green-Dot card  
3 numbers to defendant NANCY DUARTE representing \$425 in Mexican Mafia  
4 LACJ Enterprise extortion money.

5       Overt Act No. 264: On August 4, 2014, defendant NANCY DUARTE  
6 directed an unknown floor shot-caller within NCCF to send  
7 "everything," that is, the drug and extortion money, to defendant  
8 HECTOR DUARTE because defendant HECTOR DUARTE was in charge of NCCF  
9 for DMM-2.

10       Overt Act No. 265: On August 6, 2014, defendant HECTOR DUARTE  
11 gave defendant NANCY DUARTE a Green Dot number representing kitty  
12 proceeds.

13       Overt Act No. 266: On August 15, 2014, in a recorded telephone  
14 conversation, defendants HECTOR DUARTE and NANCY DUARTE, and co-  
15 conspirator Miguel Rodriguez, discussed Mexican Mafia LACJ Enterprise  
16 matters including defendant NANCY DUARTE giving co-conspirator Miguel  
17 Rodriguez Green Dot numbers representing proceeds from Mexican Mafia  
18 LACJ Enterprise activities, and discipline to be imposed on an  
19 unknown Hispanic gang member because the unknown Hispanic gang member  
20 had "dropped-out" and gone into protective custody.

21       Overt Act No. 267: On August 15, 2014, in a recorded telephone  
22 conversation, defendant HECTOR DUARTE asked co-conspirator Miguel  
23 Rodriguez how much discipline to impose on an unknown Hispanic gang  
24 member, and co-conspirator Miguel Rodriguez conferred with DMM-2 then  
25 told defendant HECTOR DUARTE how to administer discipline and to  
26 decide on an amount for a fine.

27       Overt Act No. 268: On August 15, 2014, in a recorded telephone  
28 conversation, defendant HECTOR DUARTE stated that he would impose a

1 \$10,000 fine and order that an unknown Hispanic gang member be beaten  
2 three times for 39 seconds.

3 Overt Act No. 269: On August 15, 2014, in a recorded telephone  
4 conversation, co-conspirator Miguel Rodriguez directed defendant  
5 HECTOR DUARTE to control the Mexican Mafia LACJ Enterprise's  
6 activities in the south and north facilities of NCCF.

7 Overt Act No. 270: On August 15, 2014, in a recorded telephone  
8 conversation, defendant NANCY DUARTE relayed messages between  
9 defendant HECTOR DUARTE and co-conspirators Miguel Rodriguez and DMM-  
10 2 about discipline of an unknown Hispanic gang member and other  
11 Mexican Mafia LACJ Enterprise business.

12 Overt Act No. 271: On August 20, 2014, in a recorded telephone  
13 conversation, defendants HECTOR DUARTE and NANCY DUARTE, and co-  
14 conspirator Miguel Rodriguez, discussed Mexican Mafia LACJ Enterprise  
15 matters; defendant HECTOR DUARTE gave defendant NANCY DUARTE Green  
16 Dot numbers representing kitty proceeds; co-conspirator Miguel  
17 Rodriguez told defendant HECTOR DUARTE that DMM-2 was upset about not  
18 receiving \$10,000 in fine money and that the north facility of NCCF  
19 was a month behind in making their payments; and co-conspirator  
20 Miguel Rodriguez informed defendant HECTOR DUARTE that DMM-2 wanted  
21 the shot-caller for the north facility to be changed.

22 Overt Act No. 272: On August 31, 2014, in a recorded telephone  
23 call, defendant HECTOR DUARTE relayed Green Dot card numbers to  
24 defendant NANCY DUARTE representing \$385 in Mexican Mafia LACJ  
25 Enterprise extortion money.

26 Overt Act No. 273: On August 31, 2014, in a recorded telephone  
27 call, defendant HECTOR DUARTE directed defendant NANCY DUARTE that a  
28

1 Sureno was to be assaulted for losing Mexican Mafia LACJ Enterprise  
2 extortion money.

3       Overt Act No. 274: On October 23, 2014, defendant NANCY DUARTE  
4 possessed ledgers containing her records of Mexican Mafia LACJ  
5 Enterprise kitty, drug, and fine debts and payments.

6       Directions to Send Mexican Mafia LACJ Enterprise Business and  
7       Proceeds Through Defendant GABRIEL ZENDEJAS-CHAVEZ

8       Overt Act No. 275: On August 30, 2014, unindicted co-  
9 conspirator 43 ("UICC-43") possessed a kite written by another  
10 unknown co-conspirator directing that Mexican Mafia LACJ Enterprise  
11 proceeds from drug sales in LACJ and kitty money from LACJ should be  
12 sent to defendant GABRIEL ZENDEJAS-CHAVEZ and directing that co-  
13 conspirator Ernesto Vargas be recognized as having the authority to  
14 run NCCF.

15       Assault and Extortion of M.C. for Interfering with Mexican Mafia LACJ  
16       Enterprise Extortion

17       Overt Act No. 276: From August 20, 2014, and September 26,  
18 2014, defendants DAVID BERNARDINO, HECTOR DUARTE, and NANCY DUARTE,  
19 and co-conspirator Gail Ponce, processed the proceeds of the Mexican  
20 Mafia LACJ Enterprises extortion and drug trafficking activities  
21 using Green Dot accounts.

22       Overt Act No. 277: On September 1, 2014, in a recorded  
23 telephone call, defendant DAVID BERNARDINO reported to co-conspirator  
24 Gail Ponce that a Paisa was taxing inmates and asked co-conspirator  
25 Gail Ponce to get instructions from defendants HECTOR DUARTE and  
26 NANCY DUARTE as to how to deal with the Paisa.

27       Overt Act No. 278: On September 1 or 2, 2014, co-conspirator  
28 Gail Ponce told defendant NANCY DUARTE that defendant DAVID

1 BERNARDINO wanted instructions on how to deal with the Paisa who was  
2 taxing inmates.

3       Overt Act No. 279: On September 2, 2014, in a recorded  
4 telephone call, defendant NANCY DUARTE told defendant HECTOR DUARTE  
5 about the Paisa who was taxing inmates and asked if defendant HECTOR  
6 DUARTE wanted the Paisa to be assaulted.

7       Overt Act No. 280: On September 2, 2014, in a recorded  
8 telephone call, defendant HECTOR DUARTE told defendant NANCY DUARTE  
9 that defendant DAVID BERNARDINO should investigate which Mexican  
10 Mafia member the Paisa claims to work for and to assault the Paisa  
11 for 39 seconds.

12       Overt Act No. 281: On September 2 or 3, 2014, defendant NANCY  
13 DUARTE passed along to co-conspirator Gail Ponce defendant HECTOR  
14 DUARTE's message that defendant DAVID BERNARDINO should investigate  
15 which Mexican Mafia member the Paisa claims to work for and to  
16 assault the Paisa for 39 seconds.

17       Overt Act No. 282: On September 3, 2014, in a recorded  
18 telephone call, co-conspirator Gail Ponce passed along to defendant  
19 DAVID BERNARDINO defendant HECTOR DUARTE's message that defendant  
20 DAVID BERNARDINO should investigate which Mexican Mafia member the  
21 Paisa claimed to work for and to assault the Paisa for 39 seconds.

22       Overt Act No. 283: On September 3 or 4, 2014, defendant DAVID  
23 BERNARDINO ordered that the Paisa, now known to be M.C., be  
24 assaulted.

25       Overt Act No. 284: On September 4, 2014, unindicted co-  
26 conspirators assaulted M.C. as discipline for disrespecting Mexican  
27 Mafia LACJ Enterprise's authority.

28

1       Overt Act No. 285: On September 5, 2014, in a recorded  
2 telephone call, defendant DAVID BERNARDINO reported to co-conspirator  
3 Gail Ponce that the Paisa, Marco Calderon, had been assaulted, but  
4 that the assault was not completed because Marco Calderon screamed  
5 and deputies interceded before the assault "could really get going."

6       Assault of E.O to Collect an Extortion Debt

7       Overt Act No. 286: On September 7, 2014, in a recorded  
8 telephone call, co-conspirator Miguel Rodriguez directed defendant  
9 HECTOR DUARTE to have E.O. assaulted for failing to pay the Mexican  
10 Mafia LACJ Enterprise's thirds tax and for lying about doing so under  
11 the authority of another Mexican Mafia member.

12       Overt Act No. 287: On September 8, 2014, defendant HECTOR  
13 DUARTE ordered that E.O. be assaulted and his drugs were to be  
14 confiscated because E.O. had lied about another Mexican Mafia member  
15 "blessing" the drugs.

16       Overt Act No. 288: On September 9, 2014, unindicted co-  
17 conspirators assaulted E.O. as discipline for violating Mexican Mafia  
18 LACJ Enterprise rules.

19       Overt Act No. 289: On September 11, 2014, unindicted co-  
20 conspirators assaulted E.O. as discipline for violating Mexican Mafia  
21 LACJ Enterprise rules.

22       Conspiracy to Remove Mexican Mafia Member A.E. From Power and to Take  
23       Over His Territories

24       Overt Act No. 290: On or before April 25, 2014, defendant JOSE  
25 LANDA-RODRIGUEZ wrote a kite to co-conspirator Donato Gonzales to  
26 inform him that defendant JOSE LANDA-RODRIGUEZ, DMM-2, and other  
27 Mexican Mafia members intended to strip Mexican Mafia membership from  
28 A.E.

1       Overt Act No. 291: On or before April 25, 2014, defendant JOSE  
2 LANDA-RODRIGUEZ wrote a kite to co-conspirator Luis Garcia to inform  
3 him that defendant JOSE LANDA-RODRIGUEZ, DMM-2, and other Mexican  
4 Mafia members intended to strip Mexican Mafia membership from A.E.

5       Overt Act No. 292: On or before April 25, 2014, defendant  
6 GABRIEL ZENDEJAS-CHAVEZ passed a message from DMM-2 to defendant JOSE  
7 LANDA-RODRIGUEZ regarding the decision to strip Mexican Mafia  
8 membership from A.E.

9       Overt Act No. 293: On June 30, 2014, in a recorded telephone  
10 conversation, defendant JOSE LANDA-RODRIGUEZ and unindicted co-  
11 conspirator 45 ("UICC-44") discussed threatening the life of D.C.  
12 because of his alignment with Mexican Mafia member A.E. and his  
13 collecting of taxes in areas controlled by defendant JOSE LANDA-  
14 RODRIGUEZ.

15       Overt Act No. 294: In or around August 2014, defendants GABRIEL  
16 ZENDEJAS-CHAVEZ and RAFAEL LEMUS, and co-conspirators Ernesto Vargas  
17 and Miguel Rodriguez met at defendant GABRIEL ZENDEJAS-CHAVEZ's law  
18 office and discussed A.E. being removed from the Mexican Mafia and  
19 other members taking over his territories.

20       Overt Act No. 295: On September 14, 2014, an unknown co-  
21 conspirator killed D.C. because of his alignment with A.E. and his  
22 collection of taxes in areas controlled by defendant JOSE LANDA-  
23 RODRIGUEZ.

24       Overt Act No. 296: On October 22, 2014, co-conspirator Miguel  
25 Rodriguez passed a message to defendant JOSE LANDA-RODRIGUEZ from  
26 defendant RAFAEL LEMUS that Mexican Mafia members were in agreement  
27 about stripping A.E. of his membership and taking over his  
28 territories.

1       Overt Act No. 297: On November 11, 2014, an unknown co-  
2 conspirator killed G.E. because of his alignment with A.E.

3       Defendant GABRIEL ZENDEJAS-CHAVEZ Used His Status as an Attorney to  
4       Pass Messages About Mexican Mafia Business

5       Overt Act No. 298: On September 2, 2014, September 3, 2014, and  
6 October 1, 2014, defendant GABRIEL ZENDEJAS-CHAVEZ used his status as  
7 an attorney to visit ten Mexican Mafia members at Pelican Bay State  
8 Prison, including Mexican Mafia member 4, and pass messages about new  
9 Mexican Mafia members and about the identity of possible cooperators.

10       Overt Act No. 299: Between October 1, 2014, and October 22,  
11 2014, after visiting Pelican Bay State Prison, defendant GABRIEL  
12 ZENDEJAS-CHAVEZ reported to defendant RAFAEL LEMUS and co-conspirator  
13 Miguel Rodriguez that: defendant GABRIEL ZENDEJAS-CHAVEZ had found  
14 paperwork that co-conspirator Luis Garcia, unindicted co-conspirator  
15 45 ("UICC-45"), and UICC-38 were cooperating with law enforcement;  
16 Mexican Mafia Member 4 confirmed that "Cartoon" from the Canta Ranas  
17 gang was now a Mexican Mafia member; and A.E. had been stripped of  
18 his territories.

19       Overt Act No. 300: On or before October 22, 2014, co-  
20 conspirator Miguel Rodriguez wrote a kite at the direction of DMM-2's  
21 secretary, defendant RAFAEL LEMUS, stating that defendant GABRIEL  
22 ZENDEJAS-CHAVEZ had found paperwork that co-conspirator Luis Garcia,  
23 UICC-38, and UICC-45 were cooperating with law enforcement, that  
24 "Cartoon" from the Canta Ranas gang was now an Eme member, that A.E.  
25 had been stripped of his territories, and that the accompanying drugs  
26 belonged to DMM-2 and Mexican Mafia member 13.

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1       Smuggling of Heroin and Mexican Mafia LACJ Enterprise Correspondence  
2       into LACJ

3           Overt Act No. 301: On or before October 21, 2014, co-  
4 conspirator Miguel Rodriguez directed unindicted co-conspirator Marco  
5 Meza to smuggle drugs and a kite into LACJ on behalf of DMM-2.

6           Overt Act No. 302: On October 22, 2014, at the direction of co-  
7 conspirator Miguel Rodriguez, unindicted co-conspirator Marco Meza  
8 smuggled approximately 18.82 grams of heroin into LACJ on behalf of  
9 the Mexican Mafia.

10          Overt Act No. 303: On October 22, 2014, unindicted co-  
11 conspirator Marco Meza possessed a kite from co-conspirator Miguel  
12 Rodriguez to defendant JOSE LANDA-RODRIGUEZ discussing Mexican Mafia  
13 LACJ Enterprise business, including the identity of potential  
14 cooperators as determined by defendant GABRIEL ZENDEJAS-CHAVEZ, the  
15 identity of a new Mexican Mafia member, and the standing of other  
16 Mexican Mafia members.

17       Possession of Heroin to be Smuggled into LACJ

18          Overt Act No. 304: On October 23, 2014, co-conspirator Miguel  
19 Rodriguez possessed approximately 25.78 grams of heroin at his  
20 residence with the intent to distribute it to other persons,  
21 including by smuggling into LACJ.

22       Possession of Methamphetamine, Heroin, and Cocaine, Including to be  
23       Smuggled into LACJ and Possession of a Firearm

24          Overt Act No. 305: On October 24, 2014, co-conspirator Ernesto  
25 Vargas possessed approximately 601.2 grams of methamphetamine,  
26 approximately 501.3 grams of heroin, approximately 83.4 grams of  
27 cocaine, and approximately 1.4 grams of cocaine base in the form of  
28 crack cocaine with the intent to distribute to others, including by

1 smuggling into LACJ, for the benefit of the Mexican Mafia LACJ  
2 Enterprise.

3 Overt Act No. 306: On October 24, 2014, co-conspirator Ernesto  
4 Vargas possessed a firearm, namely, a Kimber model Custom 2 .45  
5 caliber pistol, and ammunition, in order to protect narcotics for the  
6 benefit of the Mexican Mafia LACJ Enterprise.

7 Attorney GABRIEL ZENDEJAS-CHAVEZ Passes Mexican Mafia Messages

8 Overt Act No. 307: On October 30, 2014, defendant GABRIEL  
9 ZENDEJAS-CHAVEZ visited Mexican Mafia member 11 at the ADX Florence  
10 federal prison in Colorado and showed secret messages to Mexican  
11 Mafia member 11.

12 Assaults of R.B. and M.G.

13 Overt Act No. 308: On August 22, 2015, in a recorded telephone  
14 conversation, co-conspirator Genessis Blanco told unindicted co-  
15 conspirator 48 ("UICC-48") to tell co-conspirator Andrew Pineda to  
16 have R.B. assaulted because he was not recognizing the authority of  
17 DMM-2 and was interfering with Mexican Mafia LACJ Enterprise  
18 activities, including drug trafficking and extortion.

19 Overt Act No. 309: On August 22, 2015, in a recorded telephone  
20 conversation, co-conspirator Andrew Pineda told co-conspirator  
21 Genessis Blanco that M.G. was causing problems by not respecting the  
22 authority of DMM-2 and interfering with Mexican Mafia LACJ Enterprise  
23 activities, including drug trafficking and extortion.

24 Overt Act No. 310: On August 22, 2015, in a recorded telephone  
25 conversation, co-conspirator Genessis Blanco told co-conspirator  
26 Andrew Pineda to have M.G. assaulted because he was not recognizing  
27 the authority of DMM-2 and was interfering with Mexican Mafia LACJ  
28 Enterprise activities, including drug trafficking and extortion.

Overt Act No. 311: On August 22, 2015, co-conspirator Andrew Pineda ordered that R.B. and M.G. be assaulted for not recognizing the authority of DMM-2 and interfering with Mexican Mafia LACJ Enterprise activities, including drug trafficking and extortion.

Overt Act No. 312: On August 23, 2015, unindicted co-conspirators assaulted R.B. and M.G..

Overt Act No. 313: On and before October 23, 2015, co-conspirator Genessis Blanco possessed records of the Mexican Mafia LACJ Enterprises activities, including records of extortion and drug trafficking.

## Murder of P.C.

Overt Act No. 314: On April 5, 2015, in a recorded telephone conversation, defendant ALVINO MUNOZ discussed a dispute over neighborhood taxation and fines of Echo Park gang members with P.C., and P.C. told defendant ALVINO MUNOZ that he takes orders from another Mexican Mafia member and would not talk to defendant ALVINO MUNOZ about it, and would only talk to defendant JOSE LANDA-RODRIGUEZ.

Overt Act No. 315: On April 5, 2015, in a recorded telephone conversation, defendant ALVINO MUNOZ discussed with unindicted co-conspirator 50 ("UICC-50") the dispute with P.C.

Overt Act No. 316: On April 27, 2015, defendant SAMANTHA RIVERA initiated a three-way call from defendant JOSE LANDA-RODRIGUEZ to Mexican Mafia member 14 and DMM-2, and in a recorded telephone conversation, defendant JOSE LANDA-RODRIGUEZ discussed with Mexican Mafia member 14 that defendant ALVINO MUNOZ had sent someone to collect the fines of Echo Park gang members, but P.C. was interfering

1 with the collection of the fine and was disrespectful to defendant  
2 ALVINO MUNOZ.

3 Overt Act No. 317: On April 27, 2015, in the three-way call  
4 initiated by defendant SAMANTHA RIVERA, defendant JOSE LANDA-  
5 RODRIGUEZ discussed with DMM-2 that P.C. was interfering in his  
6 business and tried to push a "hard line" with defendant ALVINO MUNOZ.

7 Overt Act No. 318: On July 19, 2015, in a recorded telephone  
8 conversation, defendant ALVINO MUNOZ and UICC-50 discussed that P.C.  
9 had blocked the payment of a fine, UICC-50 stated that P.C. worked  
10 for another Mexican Mafia member, and defendant ALVINO MUNOZ told  
11 UICC-50 to shut down P.C.'s activities.

12 Overt Act No. 319: On July 19, 2015, in a recorded telephone  
13 conversation, defendant JOSE LANDA-RODRIGUEZ told defendant SAMANTHA  
14 RIVERA that P.C. is interfering and that defendant SAMANTHA RIVERA  
15 and Mexican Mafia member 4 should talk to him.

16 Overt Act No. 320: On July 19, 2015, in coded language during a  
17 recorded telephone conversations, UICC-9, on defendant JOSE LANDA-  
18 RODRIGUEZ's orders, told unindicted co-conspirator 51 ("UICC-51") the  
19 following: that P.C. was defying defendant JOSE LANDA-RODRIGUEZ; that  
20 defendant JOSE LANDA-RODRIGUEZ was angry; to meet with P.C. and  
21 "teach him a little lesson"; to tell P.C. to stay on his side of "the  
22 bridge"; that P.C. was on the "Green Light" list; that defendant JOSE  
23 LANDA-RODRIGUEZ wants P.C. "cut loose"; that defendant JOSE LANDA-  
24 RODRIGUEZ' decision is "final"; that there will be punishment for  
25 disregarding what defendant JOSE LANDA-RODRIGUEZ said; that UICC-51  
should contact DMM-2 to confirm the order; and that defendant JOSE  
LANDA-RODRIGUEZ was very angry, "pacing back and forth" and wanted to  
teach P.C. a lesson.

Overt Act No. 321: On July 26, 2015, in a recorded telephone conversation, UICC-9 told UICC-51 that defendant JOSE LANDA-RODRIGUEZ put P.C. on the Green Light list and told UICC-51 to have an unidentified co-conspirator lure P.C. in.

Overt Act No. 322: On November 21, 2015, unknown co-conspirators shot and killed P.C.

Defendant RAFAEL LEMUS Assists DMM-2 in Running Mexican Mafia LACJ  
Enterprise Business, Including Drug Trafficking and Extortion

Overt Act No. 323: Beginning in or prior to February 2014, and continuing until at least May 2015, defendant RAFAEL LEMUS assisted DMM-2 in running Mexican Mafia LACJ Enterprise business. Defendant RAFAEL LEMUS assisted in obtaining drugs from Mexico and passed messages from DMM-2 to others including to and from defendant GABRIEL ZENDEJAS-CHAVEZ.

Overt Act No. 324: On February 11, 2015, in a recorded telephone conversation, defendant RAFAEL LEMUS told an associate of A.E. that the areas formerly controlled by A.E. now belonged to defendant JOSE LANDA-RODRIGUEZ, DMM-2, and their associates.

Overt Act No. 325: On May 8, 2015, defendant RAFAEL LEMUS possessed approximately \$11,500 and Mexican Mafia-related correspondence at his residence.

Overt Act No. 326: On November 20, 2015, in a recorded telephone conversation, defendant HECTOR DUARTE explained to UICC-5 the money he collected as a shot-caller in NCCF.

Overt Act No. 327: On November 20, 2015, UICC-5 connected defendant RAFAEL LEMUS into a three-way call with defendant HECTOR DUARTE.

1       Overt Act No. 328: On November 20, 2015, in a recorded  
2 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR  
3 DUARTE that he would investigate HECTOR DUARTE's "numbers," that is,  
4 the amount of Mexican Mafia LACJ Enterprise drug trafficking and  
5 extortion proceeds he forwarded, and asked HECTOR DUARTE if anyone  
6 could verify his numbers.

7       Overt Act No. 329: On November 20, 2015, in a recorded  
8 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR  
9 DUARTE that UICC-5 is the "Senora" for DMM-2, that people should  
10 listen to UICC-5, and that failure to recognize UICC-5 will result in  
11 an assault.

12       Overt Act No. 330: On November 22, 2015, in a recorded  
13 telephone conversation, defendant RAFAEL LEMUS told co-conspirator  
14 Andrew Pineda and UICC-5 that co-conspirator Miguel Rodriguez has no  
15 status with the Mexican Mafia LACJ Enterprise and that anyone using  
16 co-conspirator Miguel Rodriguez's name will be assaulted.

17       Overt Act No. 331: On November 22, 2015, in a recorded  
18 telephone conversation, defendant RAFAEL LEMUS stated that he has the  
19 authority to appoint secretaries, that he appointed UICC-5, and that  
20 anyone who gives UICC-5 trouble will "hear from him" and have  
21 problems that follow them outside of LACJ.

22       Smuggling of Methamphetamine and Heroin into LACJ

23       Overt Act No. 332: From August 19, 2015, through September 1,  
24 2015, defendant ALVINO MUÑOZ and co-conspirator Kelly Jo Bell, and  
25 unindicted co-conspirator Robert Ramirez, arranged to smuggle drugs  
26 into LACJ for the benefit of defendant JOSE LANDA-RODRIGUEZ.

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1       Overt Act No. 333: On August 19, 2015, in a recorded telephone  
2 conversation, defendant ALVINO MUNOZ and co-conspirator Kelly Jo Bell  
3 discussed smuggling drugs into LACJ.

4       Overt Act No. 334: On August 28, 2015, in a recorded telephone  
5 conversation, co-conspirator Kelly Jo Bell told defendant ALVINO  
6 MUNOZ that she was on her way to deliver drugs to the individual who  
7 would smuggle them into LACJ.

8       Overt Act No. 335: On August 28, 2015, co-conspirator Kelly Jo  
9 Bell delivered approximately 41.8 grams of methamphetamine to  
10 unindicted co-conspirator Alejandro Martinez to smuggle into LACJ for  
11 defendant JOSE LANDA-RODRIGUEZ.

12       Overt Act No. 336: On September 1, 2015, in a recorded  
13 telephone conversation, unindicted co-conspirator Robert Ramirez  
14 discussed with another unindicted co-conspirator the fact that  
15 unindicted co-conspirator Alejandro Martinez had the drugs to be  
16 smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

17       Overt Act No. 337: On August 30, 2015, unindicted co-  
18 conspirator Alejandro Martinez possessed approximately 41.8 grams of  
19 methamphetamine and 61.83 grams of heroin inside his body and got  
20 himself arrested in order to bring the methamphetamine and heroin  
21 into LACJ.

22       Overt Act No. 338: On September 1, 2015, in a recorded  
23 telephone conversation, co-conspirator Kelly Jo Bell learned that an  
24 unindicted co-conspirator inside LACJ knew about unindicted co-  
25 conspirator Alejandro Martinez smuggling drugs into LACJ, had located  
26 unindicted co-conspirator Alejandro Martinez , and would keep co-  
27 conspirator Kelly Jo Bell updated as to the status of the drugs.

1       Overt Act No. 339: On October 14, 2015, co-conspirator Kelly Jo  
2 Bell possessed approximately 12.0 grams of methamphetamine and  
3 ledgers regarding Mexican Mafia LACJ Enterprise business.

4       Assault of C.G. for Interfering with Drug Trafficking and Extortion

5       Overt Act No. 340: On January 16, 2016, in a recorded telephone  
6 call, defendant MARK LANDEROS and UICC-6 discussed having C.G.  
7 assaulted in retaliation for C.G. attempting to take control of LACJ  
8 away from defendant JOSE LANDA-RODRIGUEZ.

9       Overt Act No. 341: On January 16, 2016, in a recorded telephone  
10 call, at defendant MARK LANDEROS' direction, UICC-6 called an  
11 unindicted co-conspirator and relayed defendant MARK LANDEROS' order  
12 that C.G. was to be assaulted.

13       Overt Act No. 342: On January 16, 2016, in a recorded telephone  
14 call, UICC-6 relayed an unindicted co-conspirator's message that C.G.  
15 was working under the orders of other Mexican Mafia members.

16       Overt Act No. 343: On January 16, 2016, UICC-6 relayed a  
17 message to UICC-16 that C.G. was to be assaulted under the authority  
18 of defendant JOSE LANDA-RODRIGUEZ for interfering with Mexican Mafia  
19 LACJ Enterprise operations, including drug trafficking and extortion.

20       Overt Act No. 344: On January 16, 2016, in a recorded telephone  
21 call, UICC-16 relayed the order that C.G. was to be assaulted to  
22 UICC-12, a shot-caller in LACJ.

23       Overt Act No. 345: On January 26, 2016, on the orders from  
24 defendant MARK LANDEROS and UICC-12, unindicted co-conspirators  
25 assaulted C.G. at the direction of the Mexican Mafia LACJ Enterprise.

26       G.       SPECIAL SENTENCING ALLEGATIONS

27       11. Beginning on a date unknown to the Grand Jury, and  
28 continuing until at least March 29, 2018, in Los Angeles County,

1 within the Central District of California, and elsewhere, defendants  
2 JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO  
3 MUÑOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN,  
4 NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA  
5 MARTINEZ, and ADRIAN ARAIZA, and others known and unknown to the  
6 Grand Jury, conspired and agreed with each other to knowingly and  
7 intentionally (i) distribute, and (ii) possess with intent to  
8 distribute:

9           a. at least 500 grams of a mixture and substance  
10 containing a detectable amount of methamphetamine, a Schedule II  
11 controlled substance, in violation of Title 21, United States Code,  
12 Sections 846, 841(a)(1) and (b)(1)(A)(viii);

13           b. at least 50 grams of methamphetamine, a Schedule II  
14 controlled substance, in violation of Title 21, United States Code,  
15 Sections 846, 841(a)(1) and (b)(1)(A)(viii);

16           c. at least a kilogram of a mixture and substance  
17 containing a detectable amount of heroin, a Schedule I narcotic drug  
18 controlled substance, in violation of Title 21, United States Code,  
19 Sections 846, 841(a)(1) and (b)(1)(A)(i).

20           12. On or about December 16, 2013, in Los Angeles County,  
21 within the Central District of California, defendants JOSE LANDA-  
22 RODRIGUEZ and others unknown to the Grand Jury conspired unlawfully  
23 to kill J.B.-2 with malice aforethought, in violation of California  
24 Penal Code Sections 182 and 187.

25           13. From on or about April 5, 2015, through on or about  
26 November 21, 2015, in Los Angeles County, within the Central District  
27 of California, defendants JOSE LANDA-RODRIGUEZ and others unknown to  
28 the Grand Jury conspired unlawfully to kill P.C. with malice

1       aforethought, in violation of California Penal Code Sections 182 and  
2       187.

3           14. On or about April 22, 2014, in Los Angeles and San  
4       Bernardino Counties, within the Central District of California,  
5       defendant DAVID DIAZ unlawfully conspired to kill C.R. with malice  
6       aforethought, in violation of California Penal Code Sections 182 and  
7       187.

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1 COUNT TWO

2 [18 U.S.C. §§ 1959(a)(3), 2]

3 [DEFENDANTS MARK LANDEROS AND JUAN LEONARD GARCIA]

4 1. Paragraphs 1 through 13 of the General Allegations of this  
5 First Superseding Indictment and paragraphs 2 through 6 of Count One  
6 are hereby re-alleged and incorporated by reference as though fully  
7 set forth herein.

8 2. At all times relevant to this First Superseding Indictment,  
9 the Mexican Mafia LACJ Enterprise including its leaders, members, and  
10 associates, constituted an "enterprise," as defined by Title 18,  
11 United States Code, Section 1959(b)(2), that is, a group of  
12 individuals associated in fact, although not a legal entity, which is  
13 engaged in, and the activities of which affected, interstate and  
14 foreign commerce. The Mexican Mafia LACJ Enterprise constituted an  
15 ongoing organization whose members functioned as a continuing unit  
16 for a common purpose of achieving the objectives of the enterprise.

17 3. At all times relevant to this First Superseding Indictment,  
18 the Mexican Mafia LACJ Enterprise, through its members and  
19 associates, engaged in racketeering activity, as defined in Title 18,  
20 United States Code, Sections 1959(b)(1) and 1961(1), consisting of:

21 multiple acts involving:

22 a. Murder, in violation of California Penal Code Sections  
23 21a, 31, 182, 187, 189, and 664;

24 b. Kidnapping, in violation of California Penal Code  
25 Sections 21a, 31, 182, 207, 209, and 664;

26 c. Robbery, in violation of California Penal Code  
27 Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

1                   d. Extortion, in violation of California Penal Code  
2 Sections 21a, 31, 182, 518, 519, 524, and 664;

3                   multiple offenses involving:

4                   e. the distribution of, possession with intent to  
5 distribute, and conspiracy to possess with intent to distribute and  
6 distribute controlled substances, including methamphetamine, heroin,  
7 cocaine, cocaine base, and marijuana, in violation of Title 21,  
8 United States Code, Sections 841(a)(1) and 846;

9                   and multiple acts indictable under the following provisions of  
10 federal law:

11                   f. Title 18, United States Code, Section 1512, Tampering  
12 with a Witness;

13                   g. Title 18, United States Code, Section 1513,  
14 Retaliating against a witness;

15                   h. Title 18, United States Code, Sections 1956 and 1957,  
16 Money Laundering;

17                   i. Title 18, United States Code, Section 1028, Identity  
18 Fraud; and

19                   j. Title 18, United States Code, Section 1029, Access  
20 Device Fraud.

21                  4. On or about March 31, 2013, in Los Angeles County, within  
22 the Central District of California, for the purpose of maintaining  
23 and increasing position in the Mexican Mafia LACJ Enterprise, an  
24 enterprise engaged in racketeering activity, defendants MARK  
25 LANDEROS, aka "Smokey," aka "Troy," aka "Hot," and JUAN LEONARD  
26 GARCIA, aka "Little John," aka "Trevor," unlawfully and knowingly  
27 assaulted A.R. with a dangerous weapon, which assault resulted in

1 serious bodily injury, in violation of California Penal Code Sections  
2 31, 245(a)(1) and (4).  
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1 COUNT THREE

2 [18 U.S.C. §§ 1959(a)(1), 2(a)]

3 [DEFENDANT DAVID DIAZ]

4 1. Paragraphs 1 through 13 of the General Allegations of this  
5 First Superseding Indictment, paragraphs 2 through 6 of Count One,  
6 and Paragraphs 2 and 3 of Count Two of this First Superseding  
7 Indictment are hereby re-alleged and incorporated by reference as  
8 though fully set forth herein.

9 2. On or about April 22, 2014, in Los Angeles and San  
10 Bernardino Counties, within the Central District of California, for  
11 the purpose of maintaining and increasing position in the Mexican  
12 Mafia LACJ Enterprise, an enterprise engaged in racketeering  
13 activity, defendant DAVID DIAZ, aka "Stomps," unlawfully and  
14 knowingly kidnapped C.R., in violation of California Penal Code  
15 Sections 31, 207.

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1 COUNT FOUR

2 [18 U.S.C. § 1959(a)(5)]

3 [DEFENDANT DAVID DIAZ]

4 1. Paragraphs 1 through 13 of the General Allegations of this  
5 First Superseding Indictment, paragraphs 2 through 6 of Count One,  
6 and Paragraphs 2 and 3 of Count Two of this First Superseding  
7 Indictment are hereby re-alleged and incorporated by reference as  
8 though fully set forth herein.

9 2. On or about April 22, 2014, in Los Angeles and San  
10 Bernardino Counties, within the Central District of California, for  
11 the purpose of maintaining and increasing position in the Mexican  
12 Mafia LACJ Enterprise, an enterprise engaged in racketeering  
13 activity, defendant DAVID DIAZ, aka "Stomps," and others known and  
14 unknown to the Grand Jury, unlawfully and knowingly conspired to  
15 kidnap C.R., in violation of California Penal Code Sections 182 and  
16 207.

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1 COUNT FIVE

2 [21 U.S.C § 846]

3 [DEFENDANTS JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL  
4 LEMUS, ALVINO MUÑOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS,  
5 CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO,  
6 MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, ROBERT RAMIREZ, BRYANNA  
7 MCCULLAH, AND JUAN NMN GARCIA]

8 1. Paragraphs 1 through 13 of the General Allegations of this  
9 First Superseding Indictment, and paragraphs 2 through 6 of Count One  
10 of this First Superseding Indictment, are re-alleged and incorporated  
11 by reference as though fully set forth herein.

12 A. OBJECTS OF THE CONSPIRACY

13 2. Beginning on a date unknown to the Grand Jury and  
14 continuing until at least March 29, 2018, in Los Angeles and San  
15 Bernardino Counties, within the Central District of California, and  
16 elsewhere, defendants JOSE LANDA-RODRIGUEZ, aka "Jose Rodriguez-  
17 Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox," aka "Fox  
18 Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo," aka "Red  
19 Tail," aka "Pops," aka "Tio," aka "The General," aka "Taras," aka  
20 "The Old Man," aka "The Animal," aka "Old School," GABRIEL ZENDEJAS-  
21 CHAVEZ, aka "Corbatas," RAFAEL LEMUS, aka "Ere," aka "The Voice," aka  
22 "La Voz," ALVINO MUÑOZ, aka "Bino," aka "B," HECTOR DUARTE, aka "Lil  
23 Man," aka "Hecko," SAMANTHA RIVERA, aka "Sam," aka "S," MARK  
24 LANDEROS, aka "Smokey," aka "Troy," aka "Hot," CECILIA VIRGEN, aka  
25 "Cecilia DeLeon," aka "Sessy," aka "Hazel," aka "Gia," aka "Sky," aka  
26 "Hooker," NANCY DUARTE, aka "Pink," VALENTIN CORDOVA, aka "Teen,"  
27 DAVID BERNARDINO, aka "Downer," MIRIAM MEZA, ANA MARTINEZ, aka "Ana  
28 America," aka "Bandit," ADRIAN ARAIZA, aka "Chemo," ROBERT RAMIREZ,

1 aka "Wiz," BRYANNA MCCULLAH, aka "Bee Bee," and JUAN NMN GARCIA, aka  
2 "Trouble," and others known and unknown to the Grand Jury, conspired  
3 and agreed with each other to knowingly and intentionally distribute,  
4 and possess with intent to distribute, the following controlled  
5 substances:

6 a. at least 500 grams of a mixture and substance  
7 containing a detectable amount of methamphetamine, a Schedule II  
8 controlled substance, in violation of Title 21, United States Code,  
9 Sections 841(a)(1) and (b)(1)(A)(viii);

10 b. at least 50 grams of methamphetamine, a Schedule II  
11 controlled substance, in violation of Title 21, United States Code,  
12 Sections 841(a)(1) and (b)(1)(A)(viii);

13 c. at least 100 grams of a mixture and substance  
14 containing a detectable amount of heroin, a Schedule I narcotic drug  
15 controlled substance, in violation of Title 21, United States Code,  
16 Sections 841(a)(1) and (b)(1)(B)(i);

17 d. cocaine, a Schedule II narcotic drug controlled  
18 substance, in violation of Title 21, United States Code, Sections  
19 841(a)(1) and (b)(1)(C); and

20 e. marijuana, a Schedule I controlled substance, in  
21 violation of Title 21, United States Code, Sections 841(a)(1) and  
22 (b)(1)(D).

23 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
24 ACCOMPLISHED

25 3. Paragraph 9 of Count One of this First Superseding  
26 Indictment is re-alleged and incorporated by reference as if fully  
27 set forth herein.

1 C. OVERT ACTS

2 4. On or about the following dates, in furtherance of the  
3 conspiracy, and to accomplish the object of the conspiracy,  
4 defendants JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL  
5 LEMUS, ALVINO MUÑOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS,  
6 CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO,  
7 MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, ROBERT RAMIREZ, BRYANNA  
8 MCCULLAH, and JUAN NMN GARCIA, and others known and unknown to the  
9 Grand Jury, committed and caused to be committed various overt acts  
10 within the Central District of California, and elsewhere, including,  
11 but not limited to, Overt Acts numbered 1 through 345 as set forth in  
12 Section F of Count One of this First Superseding Indictment, which  
13 are re-alleged and incorporated by reference as if fully set forth  
14 herein, in addition to the following:

15 Smuggling of Heroin and Methamphetamine into LACJ

16 Overt Act No. 346: From December 19, 2012, through January 22,  
17 2013, defendant CECILIA VIRGEN and co-conspirator Jose Flores, UICC-  
18 3, and UICC-23, arranged to smuggle approximately 64.6 grams of  
19 heroin and approximately 36.7 grams of methamphetamine into LACJ on  
20 behalf of DMM-1.

21 Overt Act No. 347: On January 19, 2013, at defendant CECILIA  
22 VIRGEN's direction, UICC-23 possessed and smuggled in his body at  
23 least 64.6 grams of heroin and 36.7 grams of methamphetamine into  
24 LACJ for DMM-1.

25 Overt Act No. 348: On January 22, 2013, UICC-23 gave an unknown  
26 amount of a controlled substance to UICC-3 in LACJ.

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1                   Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

2                   Overt Act No. 349: From January 22, 2013, through February 28,  
3 2013, co-conspirator Richard Griego arranged with defendant CECILIA  
4 VIRGEN and co-conspirators Valerie Trejo and Richard Bailey, for  
5 heroin, methamphetamine, and marijuana to be smuggled to UICC-3 in  
6 LACJ on behalf of DMM-1.

7                   Overt Act No. 350: On February 28, 2013, co-conspirator Richard  
8 Griego possessed in his body and attempted to smuggle approximately  
9 26.2 grams of pure methamphetamine, approximately 62.9 grams of  
10 heroin, and approximately 11.75 grams of marijuana into LACJ for  
11 UICC-3 and DMM-1.

12                   Smuggling of Methamphetamine into LACJ

13                   Overt Act No. 351: From July 24, 2013, through August 14, 2013,  
14 co-conspirator Jonathan Rodriguez arranged with defendants MARK  
15 LANDEROS, BRYANNA MCCULLAH, and JUAN NMN GARCIA, and co-conspirator  
16 Kristen Ayala, and UICC-31, to smuggle approximately one ounce of  
17 methamphetamine and one ounce of marijuana into LACJ.

18                   Overt Act No. 352: On July 25, 2013, in a recorded telephone  
19 conversation, co-conspirator Kristen Ayala advised UICC-31 on what to  
20 do when he arrived at LACJ with the smuggled drugs.

21                   Overt Act No. 353: On August 3, 2013, in a recorded telephone  
22 conversation between defendants MARK LANDEROS and JUAN NMN GARCIA,  
23 and co-conspirator Kristen Ayala, defendant JUAN NMN GARCIA agreed to  
24 supply methamphetamine and marijuana for defendant MARK LANDEROS, and  
25 gave prices for the drugs.

26                   Overt Act No. 354: On August 3, 2014, defendant JUAN NMN GARCIA  
27 provided approximately one ounce of methamphetamine to co-conspirator  
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1 Kristen Ayala so that the methamphetamine could be smuggled into LACJ  
2 on behalf of defendant MARK LANDEROS.

3 Overt Act No. 355: On August 3, 2014, co-conspirator Kristen  
4 Ayala obtained and packaged approximately one ounce of methamphetamine  
5 so that it could be smuggled into LACJ on behalf of defendant MARK  
6 LANDEROS.

7 Overt Act No. 356: From August 4, 2013, through August 12,  
8 2013, UICC-31 possessed approximately one ounce of methamphetamine  
9 for the purpose of smuggling it into LACJ on behalf of defendant MARK  
10 LANDEROS.

11 Overt Act No. 357: On August 13, 2013, defendant BRYANNA  
12 MCCULLAH possessed approximately one ounce of methamphetamine and  
13 gave that methamphetamine to co-conspirator Jonathan Rodriguez, with  
14 the intent that it be smuggled into LACJ on behalf of defendant MARK  
15 LANDEROS.

16 Overt Act No. 358: On August 13, 2013, in a recorded telephone  
17 conversation, co-conspirator Jonathan Rodriguez agreed with defendant  
18 MARK LANDEROS to smuggle drugs into LACJ.

19 Overt Act No. 359: On August 14, 2013, co-conspirator Jonathan  
20 Rodriguez possessed approximately 22.7 grams of methamphetamine in in  
21 his body which was discovered and seized by LASD deputies.

22 Smuggling of Methamphetamine and Marijuana into LACJ via Kidney  
23 Dialysis Center

24 Overt Act No. 360: On September 21, 2013, co-conspirator  
25 Jonathan Mendez attempted to smuggle approximately 51.29 grams of  
26 marijuana and 13.2 grams of methamphetamine that had been left in a  
27 kidney dialysis center by an unknown co-conspirator.

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1 Possession of Heroin Within LACJ and Extortion

2       Overt Act No. 361: On or before December 18, 2013, co-  
3 conspirator Jonathan Rodriguez agreed to smuggle approximately 43.7  
4 grams of heroin inside Twin Towers for UICC-2 and defendant LUIS  
5 GARCIA.

6       Overt Act No. 362: On December 18, 2013, in Twin Towers, co-  
7 conspirator Jonathan Rodriguez, intending to distribute the drugs to  
8 others on behalf of defendant JOSE LANDA-RODRIGUEZ, possessed  
9 approximately 43.7 grams of heroin which was discovered and seized by  
10 LASD deputies.

11 Smuggling of Drugs in LACJ

12       Overt Act No. 363: Between April 18, 2014, and April 20, 2014,  
13 co-conspirator Frank Herrera, on behalf of co-conspirators Donato  
14 Gonzalez and Alvaro Ruiz, obtained methamphetamine and heroin for the  
15 purpose of having it smuggled into LACJ.

16       Overt Act No. 364: From April 20, 2014, through April 22, 2014,  
17 an co-conspirator Ramon Amaya smuggled approximately 2.37 grams of  
18 heroin and 7.75 grams of methamphetamine into LACJ inside his body,  
19 with the intent to distribute the drugs within LACJ.

20       Overt Act No. 365: On April 22, 2014, co-conspirator Martin  
21 Salazar possessed approximately 2.37 grams of heroin and 7.75 grams  
22 of methamphetamine that had been smuggled into LACJ by co-conspirator  
23 Ramon Amaya in order to secrete the drugs from LASD deputies and to  
24 further distribute the drugs within LACJ.

25 Smuggling of Heroin into LACJ

26       Overt Act No. 366: On or before October 22, 2014, co-  
27 conspirator Marco Meza agreed with co-conspirator Miguel Rodriguez to  
28 smuggle heroin into LACJ.

Overt Act No. 367: On October 22, 2014, at the direction of co-conspirator Miguel Rodriguez, co-conspirator Marco Meza smuggled approximately 18.82 grams of heroin into LACJ on behalf of defendant JOSE LANDA-RODRIGUEZ.

Overt Act No. 368: On October 22, 2014, co-conspirator Marco Meza called co-conspirator Miguel Rodriguez to report that he had arrived at LACJ with the heroin he had smuggled in.

## Smuggling of Methamphetamine and Heroin into LACJ

Overt Act No. 369: On August 19, 2015, in a recorded telephone conversation, defendant ALVINO MUNOZ discussed smuggling drugs into LACJ with co-conspirator Kelly Jo Bell.

Overt Act No. 370: On September 1, 2015, in a recorded telephone conversation, defendant ROBERT RAMIREZ spoke to an unidentified unindicted co-conspirator who told defendant ROBERT RAMIREZ that co-conspirator Alejandro Martinez had the drugs to be smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

Overt Act No. 371: On September 1, 2015, in a recorded telephone conversation, defendant ROBERT RAMIREZ told co-conspirator Kelly Jo Bell that he got the message about co-conspirator Alejandro Martinez smuggling drugs into LACJ, that he located co-conspirator Alejandro Martinez right away, and that he would keep co-conspirator Kelly Jo Bell updated as to the status of the drugs.

Overt Act No. 372: On September 1, 2015, co-conspirator Alejandro Martinez, having smuggled drugs into LACJ, possessed, inside his body, approximately 41.8 grams of methamphetamine and 61.83 grams of heroin, which was discovered and seized by LASD deputies.

1 D. SENTENCING ALLEGATION

2 Prior to committing the offense alleged in this Count, defendant  
3 VALENTIN CORDOVA had been finally convicted of a serious drug felony  
4 as that term is defined and used in Title 21, United States Code,  
5 Sections 802(57), 841, and 851, namely, on or about November 15,  
6 2020, in the United States District Court for the Central District of  
7 California, case number CR 07-01079-DSF, defendant CORDOVA was  
8 convicted of Conspiracy to Possess With Intent to Distribute Cocaine,  
9 in violation of Title 21, United States Code, Section 846, for which  
10 defendant CORDOVA served a term of imprisonment of more than 12  
11 months. Defendant CORDOVA was released from a term of imprisonment  
12 for that offense within 15 years of the commencement of the offense  
13 alleged in Count Five of this First Superseding Indictment.

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1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

3 [DEFENDANTS MARK LANDEROS, JUAN NMN GARCIA, AND BRYANNA MCCULLAH]

4 On or about August 14, 2013, in Los Angeles County, within the  
5 Central District of California, defendants MARK LANDEROS, aka  
6 "Smokey," aka "Troy," aka "Hot," JUAN NMN GARCIA, aka "Trouble," and  
7 BRYANNA MCCULLAH, aka "Bee Bee," knowingly and intentionally aided,  
8 abetted, counseled, commanded, induced and procured, and willfully  
9 caused, another person to knowingly and intentionally possess with  
10 intent to distribute at least five grams, that is, approximately 22.7  
11 grams, of methamphetamine, a Schedule II controlled substance.

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1 COUNT SEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

3 [DEFENDANT GABRIEL ZENDEJAS-CHAVEZ]

4 On or about April 22, 2014, in Los Angeles County, within the  
5 Central District of California, defendant GABRIEL ZENDEJAS-CHAVEZ,  
6 aka "Corbatas," knowingly and intentionally aided, abetted,  
7 counseled, commanded, induced and procured, and willfully caused,  
8 other persons to knowingly and intentionally possess with intent to  
9 distribute at least five grams, that is, approximately 7.75 grams, of  
10 methamphetamine, a Schedule II controlled substance.

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1 COUNT EIGHT

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2]

3 [DEFENDANT GABRIEL ZENDEJAS-CHAVEZ]

4 On or about April 22, 2014, in Los Angeles County, within the  
5 Central District of California, defendant GABRIEL ZENDEJAS-CHAVEZ,  
6 aka "Corbatas," knowingly and intentionally aided, abetted,  
7 counseled, commanded, induced and procured, and willfully caused,  
8 other persons to knowingly and intentionally possess with intent to  
9 distribute approximately 2.37 grams of a mixture and substance  
10 containing a detectable amount of heroin, a Schedule I narcotic drug  
11 controlled substance.

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1 COUNT NINE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

3 [DEFENDANTS ALVINO MUÑOZ AND ROBERT RAMIREZ]

4 On or about September 1, 2015, in Los Angeles County, within the  
5 Central District of California, defendants ALVINO MUÑOZ, aka "Bino,"  
6 aka "B," and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally  
7 aided, abetted, counseled, commanded, induced and procured, and  
8 willfully caused, another person to knowingly and intentionally  
9 possessed with intent to distribute at least five grams, that is,  
10 approximately 41.8 grams, of methamphetamine, a Schedule II  
11 controlled substance.

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1 COUNT TEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2]

3 [DEFENDANTS ALVINO MUÑOZ AND ROBERT RAMIREZ]

4 On or about September 1, 2015, in Los Angeles County, within the  
5 Central District of California, defendants ALVINO MUÑOZ, aka "Bino,"  
6 aka "B," and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally  
7 aided, abetted, counseled, commanded, induced and procured, and  
8 willfully caused, another person to knowingly and intentionally  
9 possess with intent to distribute approximately 61.83 grams of a  
10 mixture and substance containing a detectable amount of heroin, a  
11 Schedule I narcotic drug controlled substance.

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1 COUNT ELEVEN

2 [18 U.S.C. §§ 1956(a)(1)(A)(i), 2(b)]

3 [DEFENDANT ANA MARTINEZ]

4 On or about May 25, 2013, in Los Angeles County, within the  
5 Central District of California, and elsewhere, defendant ANA  
6 MARTINEZ, aka "Ana America," aka "Bandit," knowing that the property  
7 involved represented the proceeds of some form of unlawful activity,  
8 conducted and willfully caused others to conduct a financial  
9 transaction affecting interstate and foreign commerce, namely, the  
10 conversion to cash of \$500 of money orders, representing the proceeds  
11 of extortion and a conspiracy to distribute controlled substances,  
12 which transaction, in fact, involved the proceeds of specified  
13 unlawful activity, that is, Extortion, in violation of California  
14 Penal Code Sections 21(a), 31, 182, 518, 519, 524, and 664, and  
15 Conspiracy to Distribute Controlled Substances, in violation of Title  
16 21, United States Code, Section 846, with the intent to promote the  
17 carrying on of such specified unlawful activity.

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1 COUNT TWELVE

2 [18 U.S.C. § 1029(a)(3)]

3 [DEFENDANT ANA MARTINEZ]

4 On or about August 7, 2013, in Los Angeles County, within the  
5 Central District of California, defendant ANA MARTINEZ, aka "Ana  
6 America," aka "Bandit," knowingly and with intent to defraud,  
7 possessed at least fifteen unauthorized access devices (as defined in  
8 Title 18, United States Code, Sections 1029(e)(1) and (3)), namely,  
9 approximately 725 social security numbers belonging to persons other  
10 than defendant ANA MARTINEZ, along with dates of birth and names of  
11 persons other than defendant ANA MARTINEZ, with said possession  
12 affecting interstate and foreign commerce.

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1 COUNT THIRTEEN

2 [18 U.S.C. § 1028A(a)(1)]

3 [DEFENDANT ANA MARTINEZ]

4 On or about August 7, 2013, in Los Angeles County, within the  
5 Central District of California, defendant ANA MARTINEZ, aka "Ana  
6 America," aka "Bandit," knowingly possessed, without legal authority,  
7 means of identification that defendant ANA MARTINEZ knew belonged to  
8 another person, that is, a social security number and date of birth  
9 belonging to M.V., during and in relation to a felony violation of  
10 Title 18, United States Code, Section 1029(a)(3), Possession of at  
11 least Fifteen Unauthorized Access Devices, as charged in Count Twelve  
12 of this First Superseding Indictment.

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1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 1963]

3 1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice  
4 is hereby given that the United States of America will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Section 1963, and Title 28 United States Code, Section  
7 2461(c), in the event of any defendant's conviction of the offense  
8 set forth in Count One of this First Superseding Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) Any interest the defendant has acquired or maintained  
12 as a result of such offense;

13 (b) Any interest in, security of, claim against, or  
14 property or contractual right of any kind affording a source or  
15 influence over, any enterprise which the defendant has established,  
16 operated, controlled, conducted, or participated in the conduct of,  
17 as a result of such offense;

18 (c) Any property constituting, or derived from, any  
19 proceeds which the defendant obtained, directly or indirectly, from  
20 racketeering activity as a result of such offense.

21 3. To the extent such property is not available for  
22 forfeiture, any defendant so convicted shall forfeit to the United  
23 States of America a sum of money equal to the total value of the  
24 property described in subparagraphs 2(a), 2(b), and 2(c).

25 4. Pursuant to Title 18, United States Code, Section 1963(m),  
26 any defendant so convicted shall forfeit substitute property, up to  
27 the total value of the property described in the preceding paragraph  
28 if, as the result of any act or omission of said defendant, the

1 property described in the preceding paragraph, or any portion thereof  
2 (a) cannot be located upon the exercise of due diligence; (b) has  
3 been transferred, sold to or deposited with a third party; (c) has  
4 been placed beyond the jurisdiction of the court; (d) has been  
5 substantially diminished in value; or (e) has been commingled with  
6 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 21,  
6 United States Code, Section 853 and Title 28, United States Code,  
7 Section 2461(c), in the event of any defendant's conviction of the  
8 offenses set forth in any of Counts Five through Ten of this First  
9 Superseding Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) All right, title and interest in any and all property,  
13 real or personal, constituting or derived from, any proceeds which  
14 the defendant obtained, directly or indirectly, from any such  
15 offense;

16 (b) All right, title and interest in any and all property,  
17 real or personal, used, or intended to be used, in any manner or  
18 part, to commit, or to facilitate the commission of any such offense;  
19 and

20 (c) To the extent such property is not available for  
21 forfeiture, a sum of money equal to the total value of the property  
22 described in subparagraphs (a) and (b).

23 3. Pursuant to Title 21, United States Code, Section 853(p),  
24 any defendant so convicted shall forfeit substitute property if, by  
25 any act or omission of said defendant, the property described in the  
26 preceding paragraph, or any portion thereof: (a) cannot be located  
27 upon the exercise of due diligence; (b) has been transferred, sold  
28 to, or deposited with a third party; (c) has been placed beyond the

1 jurisdiction of the court; (d) has been substantially diminished in  
2 value; or (e) has been commingled with other property that cannot be  
3 divided without difficulty.

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1 FORFEITURE ALLEGATION THREE

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Section 982(a)(1), in the event of the defendant's  
7 conviction of the offense set forth in Count Eleven of this First  
8 Superseding Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America any property, real or personal, involved in such  
11 offense, and any property traceable to such property.

12 3. To the extent such property is not available for forfeiture,  
13 the defendant, if so convicted, shall forfeit to the United States of  
14 America a sum of money equal to the total value of the property  
15 described in paragraph 2.

16 4. Pursuant to Title 21, United States Code, Section 853(p),  
17 as incorporated by Title 18, United States Code, Section 982(b)(1),  
18 and Title 18, United States Code, Section 982(b)(2), the defendant,  
19 if so convicted, shall forfeit substitute property, if, by any act or  
20 omission of the defendant, the property described in the preceding  
21 paragraph, or any portion thereof: (a) cannot be located upon the  
22 exercise of due diligence; (b) has been transferred, sold to, or  
23 deposited with a third party; (c) has been placed beyond the  
24 jurisdiction of the court; (d) has been substantially diminished in  
25 value; or (e) has been commingled with other property that cannot be  
26 divided without difficulty. Substitution of assets shall not be  
27 ordered, however, where the convicted defendant acted merely as an  
28 intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant, in  
2 committing the offense or offenses giving rise to the forfeiture,  
3 conducted three or more separate transactions involving a total of  
4 \$100,000.00 or more in any twelve-month period.

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1 FORFEITURE ALLEGATION FOUR

2 [18 U.S.C. §§ 982 and 1029]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Sections 982(a)(2) and 1029, in the event of the  
7 defendant's conviction of the offenses set forth in either of Counts  
8 Twelve or Thirteen of this First Superseding Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds obtained, directly or indirectly, as a result of the  
14 offense;

15 (b) Any personal property used or intended to be used to  
16 commit the offense.

17 3. To the extent such property is not available for  
18 forfeiture, the defendant, if so convicted, shall forfeit to the  
19 United States of America a sum of money equal to the total value of  
20 the property described in subparagraphs 2(a) and 2(b).

21 4. Pursuant to Title 21, United States Code, Section 853(p),  
22 as incorporated by Title 18, United States Code, Sections 982(b)(1)  
23 and 1029(c)(2), the defendant, if so convicted, shall forfeit  
24 substitute property, up to the total value of the property described  
25 in the preceding paragraph if, as the result of any act or omission  
26 of the defendant, the property described in the preceding paragraph,  
27 or any portion thereof: (a) cannot be located upon the exercise of  
28 due diligence; (b) has been transferred, sold to or deposited with a

1 third party; (c) has been placed beyond the jurisdiction of the  
2 court; (d) has been substantially diminished in value; or (e) has  
3 been commingled with other property that cannot be divided without  
4 difficulty.

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6 A TRUE BILL

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8 /S/  
9 Foreperson

10 TRACY L. WILKISON  
11 United States Attorney



12 SCOTT M. GARRINGER  
13 Assistant United States Attorney  
14 Chief, Criminal Division

15 SHAWN J. NELSON  
16 Assistant United States Attorney  
17 Chief, International Narcotics, Money  
18 Laundering & Racketeering Section

19 KEITH D. ELLISON  
20 Assistant United States Attorney  
21 International Narcotics, Money  
22 Laundering & Racketeering Section

23 GREGG E. MARMARO  
24 Assistant United States Attorney  
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26 Laundering & Racketeering Section

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